SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

THURSDAY, APRIL 7, 2005

8:30 A.M.

(PAGES 5157 THROUGH 5211)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 5157

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
CHACON, Ralph	5161-SN	5202-M		

E X H I B I T S
FOR IN
PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
790 Photograph 5177 5180
791 Photograph 5177 5180
792 Photograph 5177 5180
793 Photograph 5184 5186
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796 Photograph 5196 5197

Santa Maria, California
Thursday, April 7, 2005
8:30 a.m.

THE COURT: Good morning.
THE JURY: (In unison) Good morning.
COUNSEL AT COUNSEL TABLE: (In unison)
Good morning, Your Honor.
THE COURT: Counsel, you may proceed.
MR. SNEDDON: Mr. Chacon, would you come forward, please. Right up there.
THE COURT: When you get to the witness stand, please remain standing. Face the clerk and raise your right hand.

RALPH CHACON
Having been sworn, testified as follows:

THE WITNESS: Yes, ma'am.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Ralph Chacon, C-h-a-c-o-n.

DIRECT EXAMINATION
BY MR. SNEDDON:
Q. Mr. Chacon, in order for everybody to hear you, you're going to need to lean into that microphone, okay? Would you do that for us? 5161

A. Yes, sir.
Q. Thank you.
Mr. Chacon, did you used to work at
Neverland Valley Ranch?
A. Yes, sir.
Q. During what period of time?
A. Between ‘91 and ‘94.
Q. And prior to working at Neverland Valley
Ranch, where -- what employment did you have?
A. I used to repo vehicles in Thousand Oaks.
Q. Is that where you’re from, Thousand Oaks?
A. Born and raised, yes, sir.
Q. And during the time that you were at
Neverland Valley Ranch, what was your position?
A. Security.
Q. And could you describe to the ladies and
gentlemen of the jury generally what your
responsibilities were as a security officer?
A. Secure Neverland property, front gate, fence
lines, around the main house, keeping intruders out,
and also taking care of the temperatures in the
animal areas.
Q. What shift did you work at the ranch?
A. Graveyard.
Q. Would you tell us what “graveyard,” what
that entails? What are the hours?
A. From 10:00 till 6:00 in the morning.
Q. Now, do you recall a time when you were 5162

working at the Neverland Valley Ranch in which Mr. Jackson was the subject of an investigation?
A. Yes, sir.
Q. And what years was that; do you recall?
A. I really don't. I don't recall.
Q. During the time that you were at the ranch, did you get subpoenaed to appear before the Santa Barbara County Grand Jury?
A. Yes, sir, I did.
Q. Do you recall when that was?
A. I believe it was in '94.
Q. Do you recall the month?
A. I'm guessing, could be probably May or something around there. I'm not sure.
Q. And do you know an individual by the name of Kassim Abdool?
A. Yes, sir.
Q. Who is Kassim Abdool?
A. He was at that time chief of security at Neverland.
Q. And at the time that you were subpoenaed before the grand jury, were you and Mr. Abdool carpooling back and forth to work?
A. Yes, sir, we were.
Q. And how long had you known Mr. Abdool?
A. Probably the duration of our employment at Neverland. Probably about three years. Three, four years. Something like that. 5163

Q. And to your knowledge, did Mr. Abdool also get subpoenaed to appear before the grand jury?
A. Yes, sir, he did.
Q. And do you recall where you were directed to appear, which county?
A. Supposed to be in Los Angeles County. But I didn't go to Los Angeles County.
Q. At some time prior to appearing before the grand jury, pursuant to subpoena, were you contacted by attorneys representing Mr. Jackson?
A. Yes, sir.
Q. On how many occasions?
A. I can remember two occasions that I was called to come before them.
Q. And do you recall who those attorneys were?
A. Mr. Steve Cochran, I believe, and I remember an Eric Mason. Mr. Sanger.
Q. Do you recall where the first meeting occurred?
A. It happened in Mr. Jackson's outside office at Neverland.
Q. And do you recall when the second meeting occurred?
A. It happened in Santa Barbara at Mr. Sanger's office.
Q. And were both of these meetings prior to the time you were to appear before the grand jury, your subpoena date? 5164

A. Yes, sir.
Q. Now, as a result of the receiving a subpoena to the grand jury, did you make contact with law enforcement?
A. Yes, I did.
Q. And do you recall who it was you contacted?
A. I believe it was Mr. Birchim.
Q. And do you recall what agency Mr. Birchim worked for?
A. I believe it was the sheriff -- Santa Barbara Sheriff's Department.
Q. And when you -- I'm sorry. When you contacted Mr. Birchim, did you have a conversation with him?
A. Yes, sir.
Q. And did you relay to him certain information?
A. I did.
Q. And after that, did you have contact with any other -- was there more than one meeting with Mr. Birchim?
A. I'm sure there was, but I don't remember. But I know there was more than two meetings with him.
Q. Now, you told the ladies and gentlemen of the jury that you did not appear before the Los Angeles County Grand Jury. Did you at some time make a statement under oath with regard to what you 5165

observed?
A. Yes, sir, I did.
Q. And do you recall when that was?
A. I believe it was ‘94. I’m not for certain.
It’s been a while.
Q. Do you recall whether it was at or about the
time when you were supposed to appear before the
grand jury?
A. Oh. Yes, sir. It was probably the day
after.
Q. And do you recall where it was that you were
interviewed?
A. In Santa Barbara.
Q. And do you recall who was present during the
time that you were interviewed?
A. Well, the only ones that I remember is
yourself and Mr. Birchim.
Q. And was that statement given under oath?
A. Yes, sir.
Q. Now, during the time that you were employed
at Neverland Ranch, did you personally observe
anything that you felt was inappropriate with regard
to Mr. Jackson’s behavior --
A. Yes, sir.
Q. -- or conduct?
And do you recall approximately what year
that was?
A. I want to say latter ‘92 or early ‘93. I am 5166

not -- I'm not positive.
Q. Do you recall what time of day or night it was?
A. It was -- well, I had come on graveyard shift, so it had to have been about probably midnight, or before midnight.
Q. And do you recall what the weather was like that night?
A. It was very nice. Very nice weather.
Q. Now, when you first came to work that evening, what were the first things that you did; do you recall?
A. I would come in and check out the radio. We carried radios and a flashlight. I would check my box for any memos that were generated. Then I would -- we had -- there was electric golf carts that we had to put on chargers for the night.
Q. At some time that evening, did you see Mr. Jackson?
A. Yes, sir.
Q. And do you recall where Mr. Jackson was the first time that you saw him that evening?
A. He was headed for the Jacuzzi.
Q. And do you know whether or not he was alone or with someone?
A. He was with someone.
Q. And when you say he was with someone, do you know who that was? 5167

A. Yes, sir.
Q. Who was that?
A. That was Jordie.
Q. And could you approximate the age of Jordie?
A. I want to say nine, ten years old.
Q. So he was with a child?
A. Yes, sir.
Q. Not an adult?
A. No.
MR. MESEREAU: Objection; leading.
THE COURT: Overruled. Next question.
Q. BY MR. SNEDDON: Now, I may have missed this or I may have asked this. When you say you saw Mr. Jackson in the company of this child, Jordie, what direction were they headed?
A. Towards the Jacuzzi.
Q. Is that an area near where you were putting things away?
A. It was close by. But from the area where I was at, the garage area, I had -- I had gone to the barbecue area, which was close, maybe ten feet, to the Jacuzzi.
Q. And did you -- were you able to see Mr. Jackson and the child in the Jacuzzi?
A. I couldn't see them from where I was standing, but I could hear them in the water.
Q. Now, at some point, did you hear Mr. Jackson speak out? 5168

A. Yes, sir.
Q. And what --
Your Honor, this is not offered for the truth of the matter, but simply to explain the conduct that occurs thereafter?
THE COURT: All right.
Q. BY MR. SNEDDON: What did you hear Mr. Jackson say?
A. While in the Jacuzzi?
Q. Yes.
A. They were just -- just laughing, playing. I don’t remember what they were saying, but I know that they were talking and having fun.
Q. At some time did Mr. Jackson request something from the house?
MR. MESEREAU: Objection; leading.
THE WITNESS: That was before --
THE COURT: Just a moment.
MR. SNEDDON: You have to wait for the Judge to rule, I’m sorry.
THE WITNESS: I’m sorry.
THE COURT: Overruled.
You may answer.
Q. BY MR. SNEDDON: Okay. Now you can answer.
THE COURT: Do you want the question read back?
THE WITNESS: No, sir.
Well, actually, that was -- I heard them -- 5169

I heard him when I was still hooking up the golf carts. He had called for security.
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Okay. So at some point you heard Mr. Jackson yell for security?
A. Yes, sir.
Q. And where were you when that occurred?
A. I was in the garage area.
Q. Now, at some point that evening, did you see Mr. Jackson and the child, Jordie, leave the Jacuzzi?
A. Yes, sir, I did.
Q. Could you tell the ladies and gentlemen of the jury, were you able to observe where they went?
A. Yes, sir.
Q. And where did they go?
A. They were going to the outside rest room area by the rec room.
Q. And is the rec room near another building or attached to a building on the premises?
A. Well, it's on its -- the rest room's attached to the rec room. So it sits by itself. It's two stories.
Q. All right. Are there other facilities inside of that building itself?
A. Just a game room, that's all it was.
Q. Do you know what the game room is called? 5170

A. Just -- no, I don't.
Q. Describe the game room, if you would.
A. They had, like, probably maybe 20 different type of computer games, the first floor, and also with the top, the top floor had different type of games.
Q. Have you been in that building before?
A. Yes, sir.
Q. And do you know whether or not that building has a cellar?
A. A what, sir?
Q. A cellar?
A. Um, I want to say that had a wine cellar, yes, sir.
Q. All right. In any event, you saw Mr. Jackson and the child heading towards the rest room area; is that correct?
A. Yes, sir.
Q. Did you watch them the entire time?
A. Yes, sir.
Q. And did you see where they went?
A. They went inside the rest room.
Q. Now, where were you located when you observed this?
A. I was in the barbecue area, where I usually normally observe everything.
Q. That's a security position you're assigned?
A. Yes, sir. 5171

Q. Now, at the time that you saw Mr. Jackson and the boy go into the rest room area, did you at some point in time approach the rest room?
A. Yes, I did.
Q. Do you recall from the time that you saw Mr. Jackson and the child go into the rest room area, how long it was before you approached the area?
A. Probably a half an hour, maybe 35, 40 minutes.
Q. And then could you describe to the ladies and gentlemen of the jury where you went?
A. I went around the rec room that leads right behind the rest rooms. That's where I went.
Q. And what did you do when you got there? Well, when you got in that area, did you hear or see anything?
A. Yes, sir.
Q. And which?
A. Well, I heard first that Mr. Jackson and the boy were inside a shower, the shower room in there.
Q. How many showers are there in the rest room?
A. There was only one shower.
Q. Let's just stop right there for just a second, before we go any further. Could you explain to the ladies and gentlemen of the jury the interior of the rest room area?
A. As you go in from the rec room, the women's 5172

rest room is on the left and the men's room is on the right. And as you go in, there's a dressing area, and it's open, and it leads into where the wash basins are at, pretty large area. And then it goes into another smaller room where there's a toilet and the showers.
Q. And you said "showers."
A. Shower. Excuse me, shower.
Q. All right. Now, you've indicated that you heard some people in the shower. Did you recognize the voices?
A. Yes, sir, I did.
Q. Whose voices did you recognize?
A. Mr. Jackson's and Jordie's.
Q. And did you look into the shower area?
A. Not right away. Not the first time that I came around, because I couldn't see anything. But I started to leave the area when I -- I was thinking, I said, "What's going on here?" You know, "There's a grown man in a shower with a boy."
MR. MESEREAU: Objection; move to strike.
THE COURT: Stricken.
Q. BY MR. SNEDDON: All right. So you left?
A. Right.
Q. How far did you go?
A. I didn't go too far, probably halfway around the rec room.
Q. All right. And did you decide to go back? 5173

A. Yes, sir, I did.
Q. Why did you decide to go back?
A. I wanted to know what was going on in there.
Q. Why?
A. Because it wasn't -- it wasn't right.
MR. MESEREAU: Objection. Relevance; move to strike.
THE COURT: I'll strike the question, "Why?" And the answer.
Q. BY MR. SNEDDON: Okay. So you went back. When you went back, where did you go to?
A. I went back to the same area where the shower was located. There was a window, and I was able to see and they were no longer in the shower.
Q. So you looked into the window?
A. Yes, sir.
Q. All right. And what did you see -- where did you see Mr. Jackson and the child at this point?
A. I saw them standing in the nude in the middle area, and Jordie was on the right, and he was on the left side. Standing, facing each other.
Q. Now, at the time that you saw that, what were the lighting conditions inside of the rest room?
A. Oh, it was litted up, just that area there. Not where the shower's at, but that area, it was -- the lights were on.
Q. Did you have any difficulty seeing in there? 5174

A. Not at all, sir.
Q. Now, from the point outside looking down inside, what did you see go on between the defendant, Mr. Jackson, and Jordan Chandler?
A. I saw that Mr. Jackson was caressing the boy's hair, he was kissing him on his head, and his face, his lips. He started kissing him on the shoulders and started going down to his nipples. Started sucking his nipples. Started going down to his penis and putting it in his mouth. And about that time I just -- I left.
Q. Okay. You say you saw him go down and do what?
A. He put the little boy's penis in his mouth.
Q. Did you actually see that?
A. Yes, sir.
Q. And then you left?
A. Yes, sir.
Q. Where did you go?
A. I went back to the barbecue area.
Q. Do you recall, after you left that area and observed the things you've just related to the jury, did you see Mr. Jackson with the child again that evening?
A. Yes, sir, I did.
Q. And where were you when you saw them?
A. I was in the barbecue area.
Q. And where -- where were they when you saw 5175

them again?
A. They were coming out of the rest room.
Q. Now, from the time that you had left, when you had made your observations --
A. Yes, sir.
Q. -- and you left, till the time that they came out of the rest room, how much time had elapsed during that period of time?
A. Probably 20 minutes or 30 minutes.
Q. Now, when they came out of the rest room, could you describe what was going on?
A. Jordie was mounted on Michael's back, piggybacked, and they were headed for the back of the -- the kitchen door to the main house.
Q. Did the child, Jordan, have any clothing on?
A. He had -- I believe it was like -- it was a towel. I believe it was a towel. It's the type -- like it's a rope, but it's a towel.
Q. So a cloth robe or towel of some kind?
A. Yes, sir.
Q. Okay. And what was Mr. Jackson wearing, if you recall?
A. Same.
Q. Could you see whether or not the child, Jordan, had any other clothing on or not?
A. No, sir. I didn't observe.
Q. And where did they go?
A. They went inside the house, the main house. 5176

Q. And when they went inside the main house, did you hear or observe anything happen that you felt was unusual?
A. Yes, Mr. Jackson double-locked the door, the back door, which he normally never did. Security always went inside to secure the house inside and out.
Q. Now, you say -- you described to the jury that Mr. Jackson was kissing the boy --
A. Yes, sir.
Q. -- that you observed.
How would you describe the kissing?
A. Well, it was very passionate. Very passionately he was kissing him.
Q. And did you see his hands during the time he was kissing him?
A. Yes, sir.
Q. Where were they?
A. They were all over his body.
Q. All right. I want to show you a couple of photographs, if we might, Mr. Chacon.
I've shown these to counsel, Your Honor.
The photographs are 790, 791, and 792.
All right. Mr. Chacon, let's look at the photographs. First of all, let's start with 790.
Do you recognize that?
A. 790?
Q. Yeah. I'm sorry, you have to turn it over 5177

on the back.
A. Oh, yes, sir.
Q. All right. Let's start with that. Do you recognize what's depicted in the photograph, 790?
A. Yes, sir.
Q. And what is that?
A. That's where the swimming pool's at, and it's -- you're facing at the rec room in front of you, and to the left is the garage area where the carts -- where I was hooking up the carts.
Q. Does that photograph depict a portion or some of the route that you took where you walked to the area that you observed Mr. Jackson and the child, Jordan?
A. Yes, sir.
Q. Now, what I'd like you to do is to please take that black felt tip pen that I've given you there, and would you please just draw the path that you took that's covered by that photograph, that portion of it.
And does that photograph accurately depict the area of what you call the rec room at the time that you made the observations of Mr. Jackson and the child, Jordan?
A. Yes, sir.
Q. All right. Let's turn that one over and go to the next one that has "791" on it, okay? Do you recognize that? 5178

A. Yes, sir.
Q. All right. What is 791?
A. It's the pool area, and directly in front is the rec room and the rest room. The rest rooms.
Q. Does the photograph, 791, show the area of the entrance into the bathroom area?
A. Yes, sir.
Q. And does it show the Jacuzzi?
A. Yes, sir.
Q. And does it show the approximate area of the -- where you made your observations?
A. Well, it's behind the -- just the other side of the Jacuzzi, yes, sir.
Q. Okay. With regard to that particular photograph -- and I'm going to ask you, does it accurately depict the area as you recall it in 1992 or '93 when you made your observations?
A. Yes, sir.
Q. All right. I'm going to ask you, please, take that black marker, please, and if you would just circle the area that depicts the entrance into the rest room area?
And would you please put an "X" in the approximate area where it was that you made the observations of Mr. Jackson and the child?
Now, let's take the last photograph, which is 792 for identification purposes. Do you recognize that photograph? 5179

A. Yes, sir.
Q. And can you tell the jury what that is, please?
A. It's the barbecue area.
Q. Okay. Now, is that the area that you have made reference to in your testimony?
A. Yes, sir.
Q. And does that photograph accurately depict that area as it was back when you were working at Neverland Valley Ranch?
A. Yes, sir.
MR. SNEDDON: Your Honor, I move that 790, 791, and 792 be admitted into evidence.
MR. MESEREAU: No objection.
THE COURT: They're admitted.
MR. SNEDDON: And, Your Honor, could we have the input for the Elmo, please?
Q. BY MR. SNEDDON: This is a laser and I'm going to ask you to point to some things.
A. Okay.
Q. All right. This is the exhibit that's been marked as Exhibit 790 for identification purposes, all right? Do you recognize that, Mr. Chacon?
A. Yes, sir.
Q. Would you show the jury the black line that you placed on this particular exhibit? Okay. It starts at the left-hand side of the photograph; is that correct? 5180

A. Yes, sir.
Q. And moves - go ahead, just trace it - all the way to almost the right-hand side -- or the left-hand side of the building, correct?
A. Yes, sir.
Q. Would you tell the ladies and gentlemen of the jury, as you walk down past the side of that building that's depicted in the far right-hand side of the photograph, People's 790, what is down there?
A. There is a tennis court. It's a sunken tennis court.
Q. And what are the lighting conditions? Is there a path that goes along there?
A. Yes, sir, there is.
Q. What are the lighting conditions along that path?
A. Around the back, there wasn't.
Q. How about along the path itself?
A. Towards the -- behind the rest rooms, there was a path where there was just small little lights on the ground.
Q. Now, did you have a flashlight with you that night?
A. Yes sir.
Q. Is that part of your standard equipment --
A. Yes.
Q. -- that you carry on the graveyard shift?
A. Yes, sir. 5181

Q. The building that's depicted on the far right-hand side of the photograph - yes, sir, the one you're showing the jury there - what is that building there?
A. That's the rec room.
Q. And let's go to 791, if we could. All right. Would you show the ladies and gentlemen of the jury, first of all, what you referred to as a Jacuzzi?
A. Right here.
Q. So that's in the lower left-hand corner of the exhibit, 791?
A. Yes, sir.
Q. Now, where is the entrance to the rest room?
A. Right in there.
Q. And it's hard to see, but you drew a circle around that in black?
A. Yes, sir. Right there.
Q. And now, where -- on this photograph, if you can, can you show the approximate area of where it was that you have made the observations you described to the jury?
A. Well, this is the rest room in front, and on the side, about right in there. The path is right on the other side on the building there.
Q. On the back side of the building?
A. Yes, sir.
Q. Okay. Now, let's show the next photograph 5182

and then I'll come back to this.
This is 792 in evidence. Do you recognize
that?
A. Yes, sir.
Q. And what is that?
A. That's the barbecue area.
Q. Okay. Now, with regard to this particular
photograph, where were you located in your position
as a security officer on this evening when you
observed the defendant and the child, Jordan, walk
into the rest room?
A. I was about right in that area.
Q. So you're indicating to the right-hand side
of the barbecue area, just to the right of the post?
A. Right. Yes, sir.
Q. The post on the -- and were you behind the
barbecue itself or on the other side of it?
A. Well -- well, actually, I was like -- I was
moving up and down the side of it, on the other
side.
Q. On the outside of it?
A. Yes, sir.
Q. So not in the interior part, but --
A. Well, it was in the -- the interior is on
the other side also. Because this is in the center.
Q. Just so we can get it clarified, which side
of that were you on?
A. I was on -- I believe I was on that other 5183

side.
Q. Now, is the area of the -- let's go back to 791 for a second, if we could. You pointed out the Jacuzzi, and obviously there's a swimming pool also there.
A. Yes, sir.
Q. Now, with regard to that area, is that area lit at night?
A. It is.
Q. Or was it then? Let's put it that way.
A. Yeah, just a bit. Because the sidewalks had these lights, these small lights, as you went up through the path. And if I remember correctly, I guess there was some -- some lighting, but not that much. But you could see where you were walking, though.
MR. SNEDDON: Okay. All right. You can take that down.
I have three more photographs, I've shown them to counsel, that have been marked as 793, 794, and 795 for identification purposes. I'd like to show them to the witness.
THE COURT: All right.
Q. BY MR. SNEDDON: Mr. Chacon, I'm going to show you the photograph marked as 793. You've seen that photograph before?
A. Yes, sir.
Q. And do you recognize the person that you 5184

1 believe that that photograph depicts?
2 A. Yes, sir.
3 Q. Who is that?
4 A. Jordie.
5 Q. Is that a depiction of the child as you
6 recall him back in those days?
7 A. Yes, sir.
8 Q. And with regard to 794, it has two
9 photographs on it, one at the top and one at the
10 bottom. The one at the top is a singular photograph
11 of an individual, and the one at the bottom has four
12 people in that. Do you recognize the people in that
13 photograph?
14 A. Yes, sir.
15 Q. And again, who is that?
16 A. Jordie.
17 Q. And in the photograph at the bottom, there
18 are a number of people depicted. Which of them do
19 you recognize as Jordie?
20 A. This one here.
21 Q. Would you please take that black pen and
22 just put an arrow towards -- start on the white,
23 down below. Okay. Thank you.
24 And with regard to 795, do you recognize
25 that?
26 A. Yes, sir.
27 Q. And again, there are a number of people
28 depicted in that photograph, correct? 5185

A. Yes, sir.
Q. And do you recognize anybody in that photograph?
A. Yes, sir, I do.
Q. Who would that be?
A. That's Jordie.
Q. By "that" you mean who, in terms of -- there's one, two, three, four, five people depicted.
A. The fifth one.
Q. All the way over to the left?
A. All the way over to the left.
Q. Are these accurate depictions of the child as you recall him back in those days?
A. Yes, sir.
MR. SNEDDON: Move that they be admitted into evidence, Your Honor.
MR. MESEREAU: No objection.
THE COURT: Admitted.
Q. BY MR. SNEDDON: Now, Mr. Chacon, are you familiar with a child by the name -- a young boy by the name of Brett Barnes?
A. Yes, sir.
Q. And have you seen Mr. Barnes before?
A. Yes, sir.
Q. Have you seen him at the ranch before?
A. Yes, sir.
Q. Have you seen him in the company of the defendant before? 5186

A. Yes, sir.
Q. On how many occasions?
A. Numerous occasions. I couldn't give you a figure.
Q. When Mr. Barnes was at the ranch, do you recall whether or not his parents were with him?
A. At times they were; at other times they weren't.
Q. Now, with regard to the child you've described and identified as Jordan Chandler, and the child that you also saw as Brett Barnes, can you tell us what they look like?
A. Well, to me, I always got them confused, because they looked the same, similar. I know one was a little bit shorter than the other. But, you know, I always got them confused, but they looked -- they looked alike. Maybe one had hair a little bit shorter than the other.
MR. MESEREAU: Objection. Nonresponsive; narrative.
THE COURT: Overruled.
Q. BY MR. SNEDDON: Go ahead.
A. But I would get them -- I would -- they just looked the same to me.
MR. SNEDDON: All right. If we could have the Elmo again.
Q. I'm going to start backwards at 795. Now, would you use the -- thank you. 5187

That's the child you identified by the name of what?
A. Jordie.
Q. All right. And now 794. Let's do the bottom one for right now.
Now, the bottom one, you put an arrow; is that correct?
A. Yes, sir.
Q. Which is the child that you were identifying that you recognize as Jordie.
Okay. The one in the middle of the photograph?
A. Yes.
Q. In the front --
A. Yes, sir.
Q. -- right?
And let's -- let me ask a question about the top photograph. With regard to that photograph, do you recognize that person?
A. Yes, sir.
Q. All right. Who's that?
A. That's Jordie.
Q. Okay. And lastly, that's 793 in evidence. And you've identified that individual as also Jordie, correct?
A. Yes, sir.
MR. SNEDDON: All right. Thank you. We could have the lights again. 5188

Q. Now, during the time of your employment at Neverland Valley Ranch -- let me go back a second, okay?
A. Yes, sir.
Q. With regard to the incidents that you just described to the ladies and gentlemen of the jury here involving Mr. Jackson and the child you've identified as Jordan, correct?
A. Yes, sir.
Q. Are those -- is that -- is that what you told the grand jury when you were interviewed back in 1994?
A. Yes, sir, I did.
Q. Now, let's go on for just a moment. Did you see any other incidents involving Mr. Jackson and the child you described as Jordan?
A. Yes, sir.
Q. With regard to the second -- and let's just call it the second incident. With regard to the second incident, do you recall how much time had elapsed between the two incidents?
A. I don't recall, sir.
Q. Could you give us some idea whether it was weeks, months, or years?
A. Could have been weeks. Could have been a month. I'm not positive. It's been a while.
Q. Okay. And let me go back just for one second before we move on to the second incident. 5189

Was there another thing that occurred on the evening of the incident where you saw Mr. Jackson and the child, Jordan, in the rest room together that you had to actually make a report on?
A. Yes, sir.
Q. And what was -- what was that?
A. Well --
Q. What happened?
A. Well, Kassim Abdool and myself, we were going around the house, the back side of the house, checking for anything that was open, the normal security checkup that we would do around the house. And we observed that the two French doors in the middle of the house were wide open.
Q. And so a note was made of that to your supervisor?
A. Yes, sir.
Q. Who was your supervisor?
A. Lieutenant Wade. Kassim Abdool had written a report in regards to the French doors being open and we didn't close them.
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Sustained.
MR. MESEREAU: Move to strike.
THE COURT: After "Lieutenant Wade" is stricken.
MR. SNEDDON: Okay.
Q. So a report was prepared of that? 5190

A. Yes, sir.
Q. Now, the incident about the French doors being open, was that before or after you had observed Mr. Jackson?
A. After.
Q. It was later that evening?
A. Yes, sir.
Q. All right. Now we can move on.
On the second incident - we're going to call it the second incident just for purposes of - what was it -- were you working graveyard again?
A. Yes, sir.
Q. And do you recall approximately what time of the night it was?
A. It was in the evening, after ten o'clock when I come on.
Q. Where were you?
A. I was in the pool area. Barbecue area, pool area.
Q. And did you see Mr. Jackson that evening?
Let me go back. Did you see Jordan that evening?
A. Yes, I did.
Q. And the child you've identified as Brett, did you see him that evening?
A. Yes, sir.
Q. Where were they?
A. They were in the rec room, playing with the machines. 5191

Q. Was there any other children in the rec room?
A. Yes, I noticed a little girl, probably five, six years old. I didn't know who she was, but I'm sure she was probably a sister of one of the boys.
Q. And did you at some point become aware of the fact -- let me ask you this. Prior -- when the children were in the rec room playing, to your knowledge, was Mr. Jackson on the premises?
A. No, sir.
Q. And did you become aware at some point in time that Mr. Jackson was on the premises?
A. Yes, sir.
Q. And did you at some point see Mr. Jackson on the premises?
A. Yes, sir.
Q. And where was Mr. Jackson the first time you saw him?
A. He was coming out the back of his door -- the back door of his house, the main house.
Q. All right. And describe to the jury what you observed Mr. Jackson to do.
A. He kind of ran up to the rec room, and he was looking in from the outside, and he spotted Jordie in one of those little -- it's like a car you play, a racing car. And Mr. Jackson went around the area where the rest rooms were at. There's a back door that goes into the rec room, and he located 5192

Jordie back there, and he went to where Jordie was at and --
Q. Let's just stop right there for just a second, okay? You saw him go into the rec room through a back door entrance?
A. Yes, sir.
Q. At the time you saw him go up to Jordan, where were the other children? Could you see?
A. Yeah, they were upstairs playing games.
Q. Were the lights on inside of the rec room?
A. Yes, sir.
Q. Did you have any difficulty seeing in the rec room?
A. Oh, no. No, sir.
Q. And where were you located at the time you made these observations?
A. I was around the pool area, almost right directly in front of the rec room.
Q. Now, at that point in time when you saw Mr. Jackson go actually physically into the rec room, describe to the jury what you saw occur.
A. Well, I saw him enter through the back door of the rec room, and he went over to Jordie. He bent over and said something to him, and then he kissed him. And then they got out the back door and they ran over to Mr. Jackson's Moon Rover, and -- that was a golf cart that he had specially made for himself, and they took off. 5193

Q. When you say he kissed him, did you see
where he kissed him?
A. Not exactly, but I know he kissed him.
Q. Now, at some point that evening, did you see
Mr. Jackson again?
A. Yes, sir. When they came back.
Q. When they came back. And where were you
when they came back?
A. I was in the barbecue area.
Q. And when they came back, where did they --
physically, where did you see them when you --
A. They pulled up to what they called the
breezeway, which is between the main office and the
main house, the outside office and the main house.
Q. Okay.
A. Behind the back.
Q. And what did -- what -- was anybody else
present when they drove up?
A. Kassim Abdool was coming from the security
at that time also.
Q. So what did you see occur at that point in
time?
A. Well, I saw that Mr. Jackson and Brett --
I mean Jordie got off the cart. And Kassim noticed
that they were back, so he just headed back to the
security -- security office.
And Mr. Jackson and the boy were in front of
the -- they call it the Peter Pan display. It's a 5194

window where Peter Pan lights up.
Q. Can you describe that? Where is that
located, what building?
A. Well, it's the -- it's where the office is
at, behind the main house. It's connected. There's
a breezeway, but it's connected. And there's a
display window, or a window where this Peter Pan
display is at, where it lights up and you see
Tinkerbell flying around the window.
Q. Okay. Could you describe to the jury the
positions of the child and the defendant, Mr.
Jackson?
A. Well, they were looking at the display, the
Tinkerbell lighting up. And he was -- Jordie was in
front, Mr. Jackson was in back, and he had his hands
over like this, and --
Q. You're indicating over --
A. Over his back, towards the front.
Q. Okay.
A. And then he turned him around, kissed him.
It was passionate, but it didn't last that long.
And then his hands went down to his private areas.
And then they ran inside the house.
Q. All right. You say he kissed him, and it
was not very long but it was passionate. Where did
he kiss the child?
A. In the mouth.
Q. And when you say "his hands went down," 5195

where did they go -- whose hands went down where?
A. Mr. Jackson's hands went down to his crotch area, the boy's.
Q. The boy's?
A. Yes, sir.
Q. And what -- how long -- how long do you estimate that this incident took?
A. It was -- it didn't take very long. Probably 10 seconds, 20 minutes. I'm not sure.
Q. And then at that point what did you see?
A. They went -- ran inside the back, the inside of the house.
Q. Both the child and Mr. Jackson?
A. Yes, sir.
MR. SNEDDON: Just a moment, Your Honor. Well, I must have misplaced it. Your Honor, I have one other photograph I'd like to have marked as 796 for identification purposes. And I've shown it to counsel.
Q. With regard to the exhibit, 796, do you recognize that?
A. Yes, sir.
Q. What is -- what is that?
A. This is behind the house. This is behind the house. This is the office. And this is the breezeway.
Q. So when you talk about a breezeway in your testimony, this photograph depicts that breezeway? 5196

A. Yes, sir.
Q. And does it depict the office that you were talking about?
A. Yes, sir.
Q. All right. What I want you to do is, on that photograph, just draw a little arrow and an “O” to the building that you indicated is the office, okay?
A. Yes, sir.
Q. And then just put a big “B” in the area that you call the breezeway.
All right. Is that photograph an accurate depiction of the area as you recall it back when you observed these incidents?
A. Yes, sir.
MR. SNEDDON: All right. Move that it be admitted into evidence, Your Honor.
MR. MESEREAU: No objection.
THE COURT: It’s admitted.
MR. SNEDDON: Could we have the lights just briefly, Your Honor?
Q. All right. This is 796, the photograph we were just talking about, okay?
A. Yes.
Q. Would you use that little red laser again, and indicate -- there’s the “B” that you put, and that is the area that you consider the breezeway?
A. Yes, sir. 5197

Q. And you also put an “O” with an arrow.
Would you find that for the jury.
All right. And that’s the area that you
described as what?
A. The outer office where the display is on the
window.
Q. Okay. All right. All right. That’s good.
I just wanted to get those down so everybody can get
an idea of what it was like.
All right. We can have the lights again.
Now, prior to the time -- let me ask you
this: With regard to the testimony you’ve just
related to the ladies and gentlemen of the jury here
this morning, did you also describe those incidents
to the -- when you were asked to make a statement
under oath?
A. Yes, sir.
Q. When you were subpoenaed to the grand jury?
A. Yes, sir.
Q. Now, prior to the time that you appeared to
give a statement under oath as to the events that
you related here this morning, had you ever told
anyone about what you saw?
A. No, sir.
Q. Had you ever mentioned it to anybody?
A. No, sir.
Q. Why not?
MR. MESEREAU: Objection; relevance. 5198

THE COURT: Overruled.
You may answer.
THE WITNESS: Well, a lot of things went through my mind, but one of the things was who would believe me?
Q. BY MR. SNEDDON: Why?
A. Well --
MR. MESEREAU: Objection.
THE COURT: Sustained.
Q. BY MR. SNEDDON: What else went through your mind?
MR. MESEREAU: Objection.
THE COURT: Sustained.
Q. BY MR. SNEDDON: Have you ever personally met anybody by the name of Blanca Francia?
A. No, sir.
Q. Have you ever personally met anyone by the name of Phillipe LeMarque?
A. No, sir.
Q. Have you met Wade Robeson?
A. Yes, sir.
Q. And how did you meet Wade Robeson?
A. Just by being on the property and -- and him being on the property.
Q. How often was he on the property?
A. Numerous times, but I can’t give you a number of how many times.
Q. Mr. Chacon, when you left the ranch as an 5199

employee - okay? --
A. Yes, sir.
Q. Oh, I had another question before we get there.
Were you armed?
A. No, sir.
Q. At the time that Mr. Jackson -- during the time that you became aware of the fact that Mr. Jackson was under investigation, were there any guards on the ranch property that were armed?
A. Yes, sir.
Q. And how many?
A. There was about four or five of them.
Q. Were they people who had been employed by the ranch as security officers for -- prior to that time?
A. No, sir.
Q. Now, when you left the ranch, why did you leave?
A. I was forced to leave --
MR. MESEREAU: Objection; relevance.
THE COURT: Overruled.
You may answer.
THE WITNESS: I was forced to leave because of the OSS, the bodyguards that came on the property that were armed, because we would not comply with whatever they wanted us to do or say, because we didn’t -- we didn’t -- we went to the grand jury, 5200

but they didn't know what we had said so they had put pressure on us to quit.
Q. BY MR. SNEDDON: Did you ever tell anybody after you went to the grand jury what you had testified to in front of the grand jury?
A. After?
Q. Yeah. Anybody associated with Mr. Jackson.
A. Yes.
Q. Who was that?
A. Kassim Abdool.
Q. And that's the person you worked with?
A. Yes, sir.
Q. Other than that, anybody else?
A. No, sir.
Q. Did you at some point in time file a lawsuit against Mr. Jackson, you and other members of the staff?
A. Yes, sir, we did.
Q. And in that particular lawsuit, where was that tried?
A. Santa Maria, right here, sir.
Q. And did you lose that lawsuit?
A. Yes, sir.
MR. SNEDDON: I have no further questions, Your Honor.
THE COURT: Cross-examine?
MR. MESEREAU: Yes, please, Your Honor.
// 5201

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good morning, Mr. Chacon.
A. Good morning, sir.
Q. Mr. Chacon, my name is Tom Mesereau, and I speak for Mr. Jackson.
A. Yes, sir.
Q. I'd like to ask you a few questions about that lawsuit you lost. That was the longest civil trial in the history of Santa Maria, right?
A. I don't know, sir.
Q. It went about six months, didn't it?
A. I believe so, yes, sir.
Q. You sued Mr. Jackson and you wanted $16 million, right?
A. Well, I don't know about the 16 million.
Q. You wanted millions, true?
A. No, sir.
Q. Really?
A. Well, I don't know, sir. Whatever our attorney was -- he's the one who was speaking for us.
Q. Okay. We'll get into that. You sued Mr. Jackson claiming you were wrongfully terminated, right?
A. That's correct, sir.
Q. He sued you claiming you had stolen property from him, true? 5202

A. That's correct, sir.
Q. The jury found you were not wrongfully terminated by Mr. Jackson, correct?
A. But we were, sir.
Q. Answer my question, please. Did the Santa Maria jury find you were not wrongfully terminated by Mr. Jackson?
A. Yes, sir.
Q. And they also found you had stolen property from Mr. Jackson, correct?
A. But I didn't, sir.
Q. Did the Santa Maria jury find you had stolen property from Mr. Jackson?
A. Yes, sir.
Q. A judgment was entered against you, Mr. Chacon, for $25,000, the value of what you had stolen, correct?
A. For candy bars, sir?
Q. A judgment was entered against you for $25,000, the value of what the Court found you had stolen, correct?
A. Well, if a candy bar is worth that much, yes, sir.
Q. That's not all you owe Mr. Jackson currently, is it?
A. No, sir. I don't owe him.
Q. In fact, Judge Zel Canter of this court, entered a judgment against you and your 5203

co-defendants for $1,473,117.61, correct?
A. Yes, sir.
Q. He ordered you pay all of Mr. Jackson's legal fees and costs, correct?
A. Yes, sir.
Q. Have you ever paid any of that judgment, Mr. Chacon?
A. No, sir. I filed bankruptcy.
Q. Now, the jury found you not only stole from Mr. Jackson, but you acted maliciously, correct?
A. No, sir.
Q. Did a judge find you had acted with malice?
A. No, sir.
Q. Is there a judgment against you for acting with fraud against Mr. Jackson?
A. That I know of, no, sir.
Q. Would it refresh your recollection to look at the judgment?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay. Oh, it's there, sir. I didn't know. Yes, sir.
Q. BY MR. MESEREAU: Have you had a chance to look at that judgment, Mr. Chacon?
A. Do you mean right now?
Q. Yes. 5204

A. Yes, sir.
Q. There is not only a judgment against you in favor of Mr. Jackson --
MR. SNEDDON: Wait a minute. I'm going to object. He asked to refresh his recollection. He should ask him if it did.
MR. MESEREAU: Sure.
THE COURT: That's correct.
Q. BY MR. MESEREAU: Have you had a chance to look at the judgment against you, Mr. Chacon?
A. I looked at that, yes, sir. But I don't remember it.
Q. Does it refresh your recollection that there's a judgment against you for fraud and malice --
A. No, sir.
Q. -- in favor of Mr. Jackson?
A. Yes, sir.
Q. You never heard of that before?
A. Well, probably, but I don't remember.
Q. After a six-month trial, you don't remember?
A. Well, it's been 12 years also, sir, or so.
Q. Do you remember stipulating and agreeing that you had personally acted with fraud, oppression and malice against Mr. Jackson?
A. Probably so, sir.
Q. You did that, didn't you?
A. No, sir. 5205

Q. You didn't stipulate that you had acted with fraud, oppression, and malice against Mr. Jackson in that case?
A. Well, yes, sir.
Q. After a six-month trial, this is a good way to get even with him, isn't it?
MR. SNEDDON: Argumentative. Object, Your Honor. Move to strike.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you have any motive today, sir, to get even with Mr. Jackson?
A. No, sir.
Q. Do you remember telling a therapist you'd rather get a million dollars from Mr. Jackson than work?
A. No, sir.
Q. Do you remember being evaluated by a Ph.D. named Dr. Scott Gorsuch?
A. I don't recall, sir.
Q. Do you recall being evaluated by a therapist in that lawsuit?
A. Probably at one point, but I don't recall it, sir.
Q. Who was your lawyer in that case?
A. Mr. Ring from Santa Barbara.
Q. Do you remember, in response to being called a malinger, you said, "I'd like just a million from Mr. Jackson"? 5206

A. That's not true, sir.
Q. Never happened?
A. No, sir.
Q. Do you recall making statements you didn't want to work again?
A. No, sir.
Q. Okay. After you left Mr. Jackson, you filed for disability, didn't you?
A. Yes, sir.
Q. You weren't disabled, were you?
A. I think it was just unemployment, wasn't it?
Q. Did you file for disability, Mr. Chacon, after you left Mr. Jackson's employment?
A. It was unemployment, I believe it was.
Q. Okay. You had a deposition taken in that case under oath, correct?
A. Yes, sir.
Q. And that was not the first time you had ever been deposed, correct?
A. I don't understand, sir, what you're saying.
Q. You had had your deposition taken in lawsuits before that one, true?
A. No, sir. Not that I recall.
Q. That was the first deposition you'd ever had taken that you recall?
A. In my life?
Q. Yes.
A. Yes, sir. 5207

Q. Okay. Do you remember being asked if you were aware that your attorney wanted $16 million for you from Mr. Jackson and you said you understood that?
A. No, sir.
Q. Would it refresh your recollection to show you a page from your deposition?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Where does it say 16 million?
Oh, okay, I see that.
Q. BY MR. MESEREAU: Have you had a chance to look at that page of your deposition?
A. Yes, sir.
Q. Remember you said you were aware that your lawyer had asked for 16 million?
MR. SNEDDON: I'm going to ask that counsel be directed to ask whether it refreshes his recollection before he reads.
MR. MESEREAU: I'm sorry. I will withdraw the question.
Q. Have you looked at that deposition?
A. Yes, sir.
Q. You were under oath at the time, correct?
A. Yes, sir.
Q. Does it refresh your recollection that you admitted you knew your lawyer had asked for $16 5208

1 million?
2 A. No, sir.
3 Q. In fact, you said you didn't think 16
4 million was enough, correct?
5 A. No, sir.
6 Q. Would it refresh your recollection if I just
7 show you your deposition?
8 A. Yes, sir.
9 MR. MESEREAU: May I approach?
10 THE COURT: Yes.
11 THE WITNESS: That's on there.
12 Q. BY MR. MESEREAU: Have you had a chance to
13 look at that page?
14 A. Yes, sir.
15 Q. Does it refresh your recollection that you
16 didn't think $16 million was enough to you?
17 A. No, sir, I don't.
18 Q. You didn't say that?
19 A. No, I mean, I don't -- now I see it's
20 written down there, yes, sir.
21 Q. Well, how much did you want in the lawsuit,
22 sir?
23 MR. SNEDDON: Object as argumentative, Your
24 Honor.
25 THE COURT: Sustained.
26 Q. BY MR. MESEREAU: In that lawsuit, you tried
27 to extort Mr. Jackson, didn't you?
28 A. No, sir. 5209

MR. SNEDDON: Object; argumentative, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember being asked at the beginning of your deposition, “Have you ever been deposed before?” And you said, “Yes”?
A. No, I don’t recall, sir.
Q. Might it refresh your recollection to see that page?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay, sir.
Q. BY MR. MESEREAU: Have you had a chance to look at that?
A. Yes, sir.
Q. Does it remind you that you admitted you had been deposed before?
A. I -- I don’t remember. But it’s down there, yes, sir.
Q. Well, you’d been in other lawsuits before this, hadn’t --
THE COURT: Counsel, I believe it’s time for our break.
MR. MESEREAU: Oh.
(Recess taken.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 5161 through 5210 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 7, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 7, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

THURSDAY, APRIL 7, 2005

8:30 A.M.

(PAGES 5157 THROUGH 5394)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 5212

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26
27
28 5213

I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Nicola is listed as “N” on index. Mr. Mesereau is listed as “M” on index.
Ms. Yu is listed as “Y” on index. Mr. Sanger is listed as “SA” on index.
Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
CHACON, Ralph	5269-SN	5280-M		
McMANUS, Adrian Marie	5283-Z	5355-M		

E X H I B I T S
FOR IN
PLAINTIFF'S NO. DESCRIPTION I.D. EVID.
797 Photocopy of note 5342 5348
798 Photocopy of half of three
$100 bills 5342 5348
797 Photocopy of note 5352 5354

1 THE COURT: Counsel?
2 MR. MESEREAU: Thank you, Your Honor.
3 Q. Mr. Chacon, you mentioned to the jury
4 someone named Kassim Abdool, right?
5 A. Yes, sir.
6 Q. And was Kassim Abdool someone you worked
7 with at Neverland?
8 A. Yes.
9 Q. And I believe you told the jury that he was
10 the first person you talked to about your claim that
11 Mr. Jackson was molesting young men, correct?
12 A. I believe so, yes, sir.
13 Q. Kassim Abdool joined you in that lawsuit
14 against Mr. Jackson, correct?
15 A. Yes, sir.
16 Q. Kassim Abdool also had a judgment against
17 him in favor of Mr. Jackson for $1,473,117.61,
18 correct?
19 A. I believe so, sir, yes.
20 Q. Kassim Abdool joined you in trying to get
21 millions from Mr. Jackson, right?
22 MR. SNEDDON: Object as argumentative, Your
23 Honor.
24 THE COURT: Overruled.
25 You may answer.
26 Q. BY MR. MESEREAU: Is that correct?
27 A. No, sir. No, sir.
28 Q. Oh, he didn't? 5216

A. No, sir.
Q. He wasn't a plaintiff with you in that case?
A. Oh, he was, yes, sir.
Q. You're saying that Mr. Abdool was not looking for millions like you?
A. No, sir.
Q. How much did he want, Mr. Chacon?
A. There wasn't an amount, sir.
Q. After a six-month trial, your lawyer didn't ask the jury to award an amount for you, sir?
A. You'll have to ask Mr. Ring.
Q. You were sitting there, weren't you?
A. Yes, sir.
Q. Did you hear him give a closing argument to the jury?
MR. SNEDDON: Your Honor, I'm going to object; argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Are you telling this jury today, under oath, you don't know how much your lawyer asked for in that six-month trial?
A. I saw it earlier when you showed --
MR. SNEDDON: Excuse me. I'm going to object as argumentative and immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: There was also someone named Adrian McManus who joined you in suing Mr. Jackson, correct? 5217

A. Yes, sir.
Q. And Adrian McManus had worked at Neverland, right?
A. That's correct, sir.
Q. And like you and Mr. Abdool, she lost the case, correct?
A. Yes, sir.
Q. A Santa Maria jury ruled against her as well, right?
A. That's correct.
Q. Now, Adrian McManus was also found to have stolen property from Mr. Jackson, true?
A. No, sir.
Q. Would it refresh your recollection if I show you the judgment?
A. Yes, sir.
MR. SNEDDON: Your Honor, I'm going to object as immaterial with regard to this witness's testimony; beyond his knowledge; no foundation.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When did you last talk to Adrian McManus?
A. Probably months; months ago.
Q. Did you talk about this case at all?
A. Only if I knew when I was coming down, and how she was doing.
Q. Is that all you discussed about this case?
A. Yes, sir. 5218

Q. How long was the conversation?
A. Oh, couldn't have lasted more than five minutes, because she was at work.
Q. When did you last talk to Kassim Abdool?
A. I have not, sir, at all.
Q. Not at all?
A. No.
Q. Okay. When's the last time you talked to him?
A. Probably the time when we left court here. Back then.
Q. Okay. All right. Now, when you sued Mr. Jackson, you had judgments against you in other cases, true?
MR. SNEDDON: Your Honor, I'm going to object as immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When you sued Mr. Jackson, the wages you were getting from Mr. Jackson were being partially garnished, correct?
MR. SNEDDON: Your Honor, I'm going to object. Same objection.
MR. MESEREAU: Financial motive, Your Honor.
THE COURT: The objection is overruled. You may answer.
Q. BY MR. MESEREAU: Correct?
A. Yes, sir.
Q. They were being garnished because you 5219

wouldn’t pay child support, true?
A. I was paying child support, sir.
Q. Then why were they garnished?
A. I assume that’s the procedure they do when they want child support from you.
Q. You couldn’t just send a check yourself?
MR. SNEDDON: I’m going to object to that --
THE COURT: Sustained; calls for a legal conclusion.
Q. BY MR. MESEREAU: At one point, you asked a Santa Barbara sheriff for money, true?
A. I don’t recall, sir.
Q. Do you recall ever asking Mr. Birchim for some money?
A. No, sir.
Q. Are you saying it never happened?
A. I don’t recall, sir.
Q. Okay. When did you last talk to Russ Birchim?
A. This morning.
Q. Where did you talk to him?
A. Here at the courthouse.
Q. Did you talk about your testimony?
A. No, sir.
Q. Okay. So you’re not denying that you asked him for money and you’re not denying he gave it to you; you just don’t remember, right?
A. I don’t recall, sir. 5220

Q. When did you first meet Russ Birchim?
A. I believe it was back in ‘93, I believe.
I’m not sure.
Q. Ever hear of a company called Commercial
Trade?
A. No, sir.
Q. You didn’t have a lawsuit with Commercial
Trade in 1989?
MR. SNEDDON: Object as immaterial.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know someone named
Judge Byrd?
A. No, sir.
Q. Judge Byrd had a judgment against you for a
couple thousand dollars, didn’t she?
MR. SNEDDON: Your Honor, I’m going to
object to this and ask the Court to admonish
counsel.
THE COURT: The --
MR. MESEREAU: It’s all part of the
financial motive, Your Honor.
THE COURT: There’s no time frame. The
problem you’re asking about is when. I don’t know
that. So I’ll sustain the objection on vagueness.
Q. BY MR. MESEREAU: At the time you sued Mr.
Jackson for an amount you don’t remember, isn’t it
true you had a judgment against you for $2600 by a
Ms. Judge Byrd? 5221

A. I don’t recall, sir.
Q. Would it refresh your recollection if I show you your deposition where you talked about it?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Oh, yes, sir.
Q. BY MR. MESEREAU: Have you had a chance to look at that deposition page?
A. Yes, sir.
Q. Did it refresh your recollection?
A. Yes, sir.
Q. Do you know who Judge Byrd is?
A. No, sir.
Q. Okay. Do you know anything about a judgment she ever had against you?
A. No, sir.
Q. Okay. Now, when did you first tell Kassim Abdool, your co-plaintiff against Mr. Jackson, about this alleged molestation you witnessed?
A. Probably when -- when we -- when we knew that we were going to be subpoenaed to the grand jury.
Q. And approximately when was that?
A. I believe it was in ‘94 sometime.
Q. By the way, do you remember testifying that Sheriff Russ Birchim delivered money to you?
A. I don’t recall, sir. 5222

Q. Would it refresh your recollection if I show you your deposition?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: It's down there, but I don't recall that, sir, at all.
Q. BY MR. MESEREAU: Okay. Do you recall saying it?
A. No, sir, I don't.
Q. Don't recall anything about it?
A. No, sir.
Q. Okay. It just is down there, right?
MR. SNEDDON: I'm going to object to the comment as argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember testifying under oath you asked Mr. Birchim for money?
A. I don't recall, sir.
MR. SNEDDON: That's been asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you remember asking for money so your wife could relocate?
A. Probably -- probably so, sir. Yes, sir.
Q. Okay. Do you remember wanting other bills paid?
A. No, sir. 5223

Q. Okay. How long after you told Kassim Abdool, your co-plaintiff, about these alleged acts of molestation did you speak to anyone from law enforcement?
A. I don't recall, sir.
Q. Was it years?
A. Oh, no. No, not years.
Q. How long was it?
A. Could have been weeks, days. I'm not certain, sir. It's been a while.
Q. Did you review any documents to get ready to testify today?
A. No, sir.
Q. Anyone send you any documents to look at --
A. No.
Q. -- before you testified today?
A. No, sir.
Q. When did you last talk to Mr. Ring about your suit against Mr. Jackson?
A. I haven't talked to Mr. Ring in years, sir.
Q. Okay. All right. Now, at the time you filed your lawsuit against Mr. Jackson, you knew that other former employees at Neverland had sold stories to tabloids about Mr. Jackson, didn't you?
A. Could you rephrase that, sir?
Q. Sure. At the time you filed your lawsuit against Mr. Jackson, you were aware that other former employees at Neverland had sold stories to 5224

1 tabloids, correct?
2 A. I don't understand the "others," sir. Which
3 others?
4 Q. Blanca Francia?
5 A. No, sir.
6 Q. Never heard of it?
7 A. Oh, yes, I heard of it. But I didn't -- I
8 wasn't aware of that.
9 Q. Were you aware of anyone else at Neverland
10 who was employed at one point trying to go to a
11 tabloid to sell a story?
12 A. No, sir.
13 Q. Never heard anything about it?
14 A. No, sir.
15 Q. Okay. Did you ever hear anything about
16 Adrian McManus doing that?
17 A. Well, we went to a tabloid.
18 Q. Which one?
19 A. It was The Star.
20 Q. And who was "we"?
21 A. It was myself, Adrian McManus, Kassim
22 Abdool, and I guess that was it.
23 Q. And approximately when did you go to this
24 tabloid?
25 A. We had met at Mr. Ring's office in Santa
26 Barbara.
27 Q. And after you met with your attorney, who
28 represented you in the lawsuit, you went to a 5225

tabloid, correct?
A. Right. Yes, sir.
Q. And you wanted money for a story, true?
A. Yes, sir.
Q. Who did you meet with at the tabloid when you requested money?
A. Can you rephrase that, sir?
Q. Yes, sir. Who did you meet with when you went to a tabloid to request money?
A. Oh, there was myself, Kassim, Adrian, and whoever the reporter was, and Mr. Ring.
Q. Your lawyer was there with you, right?
A. Yes, sir.
Q. You did it with your lawyer because you thought that negative publicity would pressure Mr. Jackson into paying all of you money, right?
A. No.
MR. SNEDDON: Object as argumentative, Your Honor.
THE COURT: Overruled. The answer was, “No.”
Next question.
Q. BY MR. MESEREAU: You went to the tabloid before the case was tried to a jury, right?
A. I believe so, yes, sir.
Q. Had you filed a case before you went to the tabloid?
A. I don’t recall, but I believe so, sir.
Q. Did you sell a story to the tabloid? 5226

A. Yes, sir.
Q. Did you ever hire a broker to help you sell other stories to other tabloids?
A. No, sir.
Q. Did you ever hear anything about McManus doing that?
A. No, sir.
Q. Okay. What other tabloids did you speak to?
A. None, sir.
Q. Just one?
A. Yes, sir.
Q. Just Star?
A. Yes, sir.
Q. But you were aware that McManus went to other tabloids, true?
A. No, sir.
Q. Just Star?
A. Yes, sir.
Q. Did you ever speak to anyone at Inside Edition?
A. No, sir.
Q. Okay. How about any other newspaper?
A. No, sir.
Q. Now, you wanted to sell information about Mr. Jackson allegedly acting wrongfully with young men, correct?
A. Yes, sir. To The Star.
Q. And you also wanted to sell information 5227

about his relationship with Lisa Marie Presley, correct?
A. No, sir.
Q. Never did that?
A. No, sir.
Q. Ever hear of any of your co-plaintiffs doing that?
A. That I recall, I don't recall, sir.
Q. Don't recall it at all?
A. No, sir.
Q. Okay. Was your story printed, to your knowledge?
A. Yes, sir.
Q. Approximately when did that happen?
A. I don't know the date, sir.
Q. Any idea at all?
A. No, sir.
Q. Okay. Can't even estimate, right?
A. No, sir.
Q. Okay. All right. How long after you told your co-plaintiff against Mr. Jackson, Mr. Kassim Abdool, about these alleged acts of molestation did you both go to a tabloid?
A. Oh, I -- it wasn't -- it wasn't right away. But I don't recall when it was.
Q. Okay. It was before you went to law enforcement, wasn't it?
A. No, sir. 5228

Q. Was it after it?
A. I believe so, sir. I don't recall.
Q. Okay. Mr. Chacon, in late '93 and early '94, you told other people that Michael Jackson was innocent of molestation accusations, didn't you?
A. No, sir.
Q. Never told that to anyone at the ranch?
A. No, sir.
Q. Okay. Are you familiar with a tabloid called Splash?
A. Yes, sir.
Q. What is Splash?
A. I believe it's a tabloid.
Q. Ever met with someone named Peter Burt from Splash?
A. I don't recall, sir.
Q. Are you saying you don't recall, or you don't -- you didn't?
A. I don't remember, sir, if I did or not.
Q. So you could have, but you don't remember?
A. Could have, but I don't remember.
Q. Okay. Do you know somebody named Sandy Domz?
A. Yes, sir.
Q. Who was Sandy Domz?
A. She was one of the secretaries at Neverland Ranch.
Q. Okay. Do you recall Sandy Domz ever 5229

approaching a tabloid?
A. No, sir.
Q. Don’t know anything about it?
A. No, sir.
Q. All right. Do you recall speaking to a book author named Gutierrez?
A. Yes, sir.
Q. And approximately when did you speak to a book author named Gutierrez?
A. I believe that was before we went to Star, and -- but I don’t remember the -- I don’t remember the date or the time.
Q. Okay. Do you remember splitting money from any tabloids with any other employees or former employees of Neverland?
A. No, sir.
Q. You never split money for giving information to a T.V. show called Inside Edition?
A. That I recall, no, sir.
Q. So you’re not telling the jury you didn’t do it, you’re just saying, “I don’t recall”?
A. Well, I don’t -- I don’t think I did it or we did it, no, sir.
Q. You don’t know for sure?
A. I just don’t recall if we did or not, sir.
Q. You might have, but you don’t remember, right?
A. I don’t remember. 5230

Q. Did you ever complain at Neverland that you should be paid more money than you were getting?
A. No, sir.
Q. Do you remember filing a claim for disability with EDD after you left Neverland?
A. No, sir.
Q. Okay. Are you saying that didn't happen?
A. Well, I filed for unemployment.
Q. Not disability?
A. No, sir.
Q. All right. When is the last time you worked at Neverland; do you know?
A. It's probably mid '94, I believe, or around there.
Q. Now, when you sued Mr. Jackson in Santa Maria, you also sued other people at Neverland, right?
A. No, sir.
Q. You sued James Van Norman, didn't you?
A. Oh, yes, sir.
Q. You sued Tony Coleman?
A. Yes.
Q. You sued Marcus Johnson, correct?
A. Yes, sir.
Q. And you sued Bill Bray, right?
A. Yes, sir.
Q. And Betty Bailey, right?
A. Yes, sir. 5231

Q. And Andrew Merritt, right?
A. I believe so, yes, sir.
Q. And you were claiming that they had wrongfully interfered with your employment, correct?
A. Yes, sir, they did.
Q. And are these some of the people that you described as being bodyguards for Mr. Jackson?
A. Yes, sir, the OSS.
Q. Yes.
A. Yes.
Q. You didn't like the OSS being at Neverland, did you?
A. No, sir.
Q. You wanted to handle all of the security yourself, correct?
A. Well, there was a time that I was in charge, and I knew what I was doing, sir.
Q. And you felt they didn't, right?
A. Well, they shouldn't have interfered with my job.
Q. Okay. And obviously you lost that claim in front of a Santa Maria jury, correct?
A. Yes.
MR. SNEDDON: Object as argumentative, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: The claims against the people in addition to Mr. Jackson who had worked at 5232

Neverland, you lost those claims, right?
A. Yes, sir.
Q. Now, at the time you sued Mr. Jackson, you had complained that you couldn't pay your rent, right?
A. No, sir.
Q. Did you ever complain to anyone you couldn't pay your rent?
A. No, sir.
Q. Never complained to any sheriff, right?
A. I don't recall. I don't think so, sir.
Q. Okay. But you don't know for sure?
A. No, sir.
Q. All right. All right. Now, when Mr. Jackson sued you for stealing his property, do you recall what property he was accusing you of stealing from him?
A. Yes, sir.
Q. What was the property?
A. It was candy bars from the theater. And the other stuff I'm not sure of, but I believe they were referring to my briefcase that had memos, my personal memos from my box at the security office.
Q. Anything else?
A. No, sir.
Q. Now, the jury found that the material you stole was worth $25,000, correct?
A. No, sir. 5233

Q. Well, they entered a judgment against you for $25,000 for maliciously converting Mr. Jackson's property, true?
MR. SNEDDON: Your Honor, I'm going to object to this.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you know what the amount was, Mr. Chacon?
MR. SNEDDON: I'm going to object. It's the same question, just asked a different way.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You were found to have stolen documents from Mr. Jackson, true?
MR. SNEDDON: Your Honor, I'm going to object; asked and answered.
MR. MESEREAU: I don't think it is.
THE COURT: That question hasn't been asked, but the ruling that I made is that the issues that you can go into are not the issues of the lawsuit. It's the same as the J.C. Penney case. You can go into what he said, what he hasn't said, the same exact ruling, and you're --
MR. MESEREAU: Okay.
THE COURT: The area you're in now has to do with the issues in the lawsuit. So I want you -- that's the line we're trying to walk here.
MR. MESEREAU: Okay. I'll move on, Your Honor. 5234

Q. Do you know someone named Linda Allen, Mr. Chacon?
A. Yes, sir.
Q. Who is Linda Allen?
A. She was my landlady in Lompoc.
Q. For how long?
A. Probably about a year. I'm not for certain of the length of time.
Q. When you were suing Mr. Jackson, you told Linda Allen you would soon be able to pay her the back rent you owed, right?
A. No, sir.
MR. SNEDDON: I'm going to object to that question. The same 403 ruling.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Did you do that, Mr. Chacon?
A. No, sir.
Q. Did you ever tell Linda Allen, "I'm going to be a star witness against Michael Jackson"?
A. No, sir.
Q. Okay. Ever tell Linda Allen you were going to be on the T.V. show Hard Copy to talk about Mr. Jackson?
A. No, sir.
Q. Did you ever tell Linda Allen you had a gun permit because you were a star witness against Michael Jackson? 5235

A. No, sir.
Q. Ever tell Ms. Allen you were going to make two or three million dollars with your suit against Mr. Jackson?
A. No, sir.
Q. Ever will tell Linda Allen you were going to be driving a 450 Mercedes after you won your suit against Mr. Jackson?
A. No, sir.
Q. All right. None of that rings a bell, right?
A. No. No.
Q. Okay. Now, in your meeting with the first tabloid that you talked to, okay, where Abdool was present, who else was there?
A. I believe Adrian McManus, Abdool, myself, Mr. Ring, and whoever represented that tabloid. I don't know, sir.
Q. Who arranged the meeting?
A. Mr. Ring.
Q. Okay. Do you know someone named Gary Morgan?
A. I've heard the name before, yes, sir.
Q. Where have you heard the name?
A. Probably -- maybe he's the one that represented the tabloid. I'm not sure.
Q. Okay. Did you ever talk to Gary Morgan?
A. I probably did, but I don't recall. 5236

Q. Okay. Do you recall ever being interviewed by someone who claimed to be a media broker, meaning they could actually get you to various tabloids on T.V. or in print?
A. No, sir.
Q. Never heard of anything about that, right?
A. No, sir.
Q. Did you draft a story for the tabloids at Mr. Ring's office?
A. Probably, yes, sir. Probably did. I don't -- I don't recall, but I probably did.
Q. Why do you say you probably did?
A. Because it's kind of vague. It's been a long time, and I guess I did. I'm -- I would say I did, yes, sir.
Q. Well, it hasn't been much longer than the period of time you claim you remember these events about Mr. Jackson, true?
A. Well, I probably did, sir, draft that --
Q. Probably did, or you did?
A. I did.
MR. SNEDDON: It's argumentative.
THE COURT: Overruled. The answer was he did. Next question.
Q. BY MR. MESEREAU: Okay. And did you draft a story for Splash?
A. I believe that was the tabloid, sir.
Q. Okay. And after you drafted it, did you 5237

meet with somebody from Splash?
A. Whoever it was. I don't recall, sir.
Q. Were you personally interviewed by somebody from Splash?
A. We all were, sir.
Q. Jointly or individually?
A. Jointly.
Q. Okay. How long was the interview with Splash?
A. Could have been an hour or so. I'm not for certain how long.
Q. Do you recall telling anyone that you were using the money from Splash to help fund your lawsuit against Michael Jackson?
A. Yes, the money went directly to Mr. Ring.
Q. And that was approximately $17,000, wasn't it?
A. I don't know, sir. But whatever it was, he did get it.
Q. So can you estimate what it was?
A. I can't, sir.
Q. Okay. Did you get any money yourself as --
A. No, sir.
Q. Do you remember telling people you gave most of it to Mr. Ring, but you took about 500 bucks yourself?
A. Well, we had taken 500 bucks, but we gave it back to Mr. Ring, because he was our lawyer and he 5238

needed money.
Q. Okay. That was to fund the lawsuit where you sought millions from Michael Jackson, correct?
A. Well, that was the lawsuit, sir.
Q. That was the lawsuit you were trying to fund by selling stories to tabloids, true?
A. No, sir.
Q. No?
A. I really don't understand your question.
Q. Sure, I'll rephrase.
You were taking money from tabloids and using it to fund costs of your lawsuit against Mr. Jackson?
A. Oh. Yes, sir. I'm sorry.
Q. And before you went to Mr. Ring, you had told various people that you never saw anything inappropriate at Neverland, true?
A. No, sir.
Q. You told various people you'd never seen Michael Jackson molest anybody, true?
A. No, sir.
Q. So if anybody comes into court and says that, they're just not telling the truth, right?
A. That's correct, sir.
Q. Okay. When you first met with representatives of the sheriff's department, did you tell them everything that you have said today about Mr. Jackson allegedly molesting young men? 5239

A. Um, when you mean a sheriff, a certain sheriff, or at the sheriff's department, or -- I don't understand.
Q. Let me rephrase.
When you first spoke to a sheriff from Santa Barbara, did you tell that sheriff everything you've said today in court?
A. No, sir.
Q. The story has changed considerably since your first meeting with a sheriff, true?
MR. SNEDDON: Your Honor, I'm going to object to the use of the word "considerably" as argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Would you agree that with each interview you do, you add more lurid facts about Mr. Jackson?
A. No, sir.
Q. You would agree your story about what you claim he did has changed through the years, has it not?
A. No, sir.
Q. Didn't you just meet with Mr. Sneddon the other day?
A. Yes, sir.
Q. Didn't you tell Mr. Sneddon you had new facts that you forgot in 1993?
MR. SNEDDON: Well, wait a minute. I'm 5240

going to object to that question. Your Honor,
that's not asked in good faith with regard to the --
I can't do it without a speaking objection, but if
we could approach the bench, because this is not
right.
THE COURT: Overruled.
The question was, "Did you tell Mr. Sneddon
you had new facts that you had forgot in 1993?"
THE WITNESS: Yes, I did.
Q. BY MR. MESEREAU: You told Mr. Sneddon that
you forgot to say certain things in 1993 about Mr.
Jackson allegedly molesting young men, true?
A. Yes, sir.
Q. But now you remembered them in 2005, right?
A. Vaguely, yes, sir.
Q. And you said the person that remembered them
with you is Kassim Abdool, true?
A. I haven't talked to Kassim in years.
Q. Okay. When did you first start work at
Neverland, Mr. Chacon?
A. I believe it was in '91, sir.
Q. Okay. You knew that in late '93 and early
'94, the media was devoting a lot of attention to
stories about Mr. Jackson at Neverland, correct?
A. Well, the media was always at Neverland at
some time or other, sir.
Q. Before you chose to go to a tabloid, you
knew that others were going to tabloids to try and 5241

1 tell stories about Mr. Jackson?
2 A. No, sir.
3 Q. You were the first, right?
4 A. That went to the media, to the tabloids?
5 Q. Yes.
6 A. Yes, sir.
7 Q. And when did you go?
8 A. It was probably '94 sometime.
9 Q. But you knew there was a lot of media
10 attention before that, correct?
11 A. There always has been, sir.
12 Q. And you knew people were making money doing
13 that, right?
14 A. No, sir.
15 Q. Weren't aware of that?
16 A. No, sir.
17 Q. Thought they were doing it all for free,
18 right, Mr. Chacon?
19 A. No, sir.
20 MR. SNEDDON: Object as argumentative, Your
21 Honor.
22 THE COURT: Sustained.
23 Q. BY MR. MESEREAU: Do you think Mr. Jackson
24 is an intimidating-looking individual?
25 A. No, sir.
26 Q. Do you remember in your deposition you said
27 you were entitled to damages because Mr. Jackson
28 stared at you? 5242

A. No, sir.
Q. Remember you said Mr. Jackson stared, and you didn't know how to take it?
A. No, sir.
Q. Would it refresh your recollection if I show you your deposition?
A. Yes, sir.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay. Okay. I remember.
Q. BY MR. MESEREAU: As part of your damage claim, do you remember saying that Mr. Jackson stared at you continuously?
A. Not continuously, sir.
Q. Well, you said "all the time," right?
A. No, sir.
Q. You said no one else saw him staring at you, right?
A. No, sir.
Q. But it bothered you, right?
A. No, sir.
Q. Okay. Why did you say it?
A. I guess just to say it.
Q. Okay. As part of your damage claim, you claimed that employees were threatening you at Neverland, right?
A. Yes, they were, sir.
Q. All right. And the jury didn't believe 5243

that, did they?
MR. SNEDDON: I'll object as argumentative.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When did you start working the graveyard shift at Neverland?
A. Immediately, sir, when I got hired on.
Q. Didn't you gradually work your way into that?
A. Immediately I went to the graveyard. Then they shifted me to swings for a while, probably a month or so, and then I ended back on graveyard. As a matter of fact, I preferred to work graveyard, sir, because I had a second job.
Q. Where was the second job?
A. In Lompoc.
Q. What was that?
A. I worked for Wayne's Tires.
Q. Do you remember problems with intruders while you worked at Neverland?
A. Yes, sir.
Q. And what problems with intruders do you remember?
A. Them coming on property and -- and we turned them over to the sheriff's department.
Q. And how often do you remember that happening?
A. Probably several times, sir.
Q. Do you recall Mr. Jackson getting nervous 5244

about that?
A. No, sir.
Q. Did he seem to care about it, to you?
A. He wasn't even there when we apprehended the people.
Q. He certainly learned about it, to your knowledge, correct?
A. I don't know, sir.
Q. You never talked to him about it?
A. No, sir.
Q. And you were not aware of anyone else telling Mr. Jackson about these problems with intruders?
A. No, sir.
Q. All right. Sir, Mr. Jackson had some personal security guards because he was worried about these intruders being caught on the property, right?
A. I don't believe so, sir.
Q. You and the other security people didn't carry any weapons, right?
A. No, sir, we didn't.
Q. And at times, that was a concern of Mr. Jackson's, wasn't it, that his security personnel there didn't have any weapon to protect him?
A. I don't know, sir.
Q. He had a general policy of not wanting people to carry weapons, true? 5245

A. I don’t know, sir.
Q. You don’t know at all?
A. No, sir.
Q. Did you ever see any of your security team carrying a weapon?
A. No, sir.
Q. Did you know why?
A. No, sir.
Q. Had no idea at all?
A. No, sir.
Q. Never inquired?
A. No, sir.
Q. When you first joined up, did you ask anybody, “Do security people carry weapons at Neverland?”
A. No, sir.
Q. Were you given any manual to refer to when you worked at Neverland?
A. Yes, sir.
Q. And what do you know about that manual?
MR. SNEDDON: I’m going to object; vague.
THE COURT: Sustained.
MR. MESEREAU: It’s vague, I’ll rephrase.
Q. Are you telling the jury that when you started working security at Neverland, nobody told you, “We have a general policy of having security people not carry arms”?
A. Well, probably so, because nobody was 5246

carrying arms.
Q. Did you have a gun permit at the time?
A. No, sir.
Q. How many meetings did you have with representatives of the sheriff's department before you think you told all the facts about what you say Mr. Jackson did with young men?
MR. SNEDDON: Your Honor, I'm going to object as argumentative; assumes facts.
THE COURT: Calls for a narrative. You can break that question down.
MR. MESEREAU: Sure.
Q. When was your first meeting with any representative of the sheriff's department regarding what you claim you saw at Neverland?
A. I don't recall, sir.
Q. Do you know approximately when it was?
A. No, sir, I don't.
Q. Was it after you saw the events you described today?
A. I don't recall, sir.
Q. Well, you've given the jury a detailed description of the events you claim you saw at Neverland, right?
A. Yes, sir.
Q. But you've forgotten when you talked to the sheriffs, correct?
A. Well, I know I talked to them, but I just 5247

don’t recall exactly when it was at, sir.
Q. Do you know approximately when it was at?
A. It was in ‘94, I believe, sometime.
Q. Do you know how many meetings you’ve had with the sheriffs to date where you have talked about Mr. Jackson’s inappropriate behavior?
A. Well, with the sheriffs, I didn’t talk about this, the allegations. But with the grand jury, which I went to testify, that was the first time, and there was sheriffs present there.
Q. You testified before a Santa Barbara Grand Jury, right?
A. Yes, sir.
Q. And after you testified, no criminal charges were brought, right?
A. Right, sir.
Q. You went to Los Angeles and talked to prosecutors --
A. No, sir.
Q. -- about what you claim -- you never did that?
A. No, sir.
Q. Didn’t you tell Mr. Sneddon on direct examination that you were subpoenaed to a grand jury in Los Angeles?
A. Oh, yes, sir. But I didn’t go.
Q. You didn’t go. But you went down to be interviewed under oath instead of going, true? 5248

A. Yes, sir.
Q. And as a result of your interview under oath, no charges were ever brought in Los Angeles, right?
A. No, sir.
Q. Do you remember testifying how upset you were at Neverland when you learned that other employees got raises and you didn't?
A. Yes, I believe there was one time.
Q. And tell the jury what that was all about.
A. Probably they had hired two or three security, and they -- I believe they paid them $12 an hour, and we were only getting $9 an hour.
Q. And did you complain about it to somebody?
A. Oh, yes, I did.
Q. Who?
A. Probably the lieutenant.
Q. And what happened?
A. Nothing ever happened.
Q. Was Mr. Abdool upset about that also, to your knowledge?
A. I believe so, yes, sir.
Q. And you and he met and talked about it, right?
A. Pardon me?
Q. You and he met and talked about it, correct?
A. Well, we all talked about that in security.
Q. You lodged a complaint, didn't you? 5249

A. No, sir.
Q. Did you think Mr. Jackson's security guards were being paid more than you?
A. The new ones, yes, sir.
Q. How did you know what they were getting paid?
A. I don't remember. I don't recall, sir, how we found out.
Q. When you told the jury you saw a young boy on Mr. Jackson's back, was that in the shower?
A. No, it was coming out, going towards his house.
Q. Was he on his shoulders?
A. You know, I don't recall if he was on his shoulders or on his back, like piggybacked, yes, sir.
Q. When you went to work at Neverland, you were asked to sign a confidentiality agreement, right?
A. Yes, sir.
Q. And everybody who works at Neverland is asked to sign one, right?
A. Yes, sir.
Q. And the purpose, as explained to you, was that Mr. Jackson doesn't want employees just running to tabloids and telling stories, right?
A. Yes, sir, I believe so.
Q. When you went to a tabloid, you violated the agreement, correct? 5250

MR. SNEDDON: Object, Your Honor, calls for a legal conclusion.
THE COURT: Overruled.
You may answer.
THE WITNESS: No, sir.
Q. BY MR. MESEREAU: You didn't violate it all?
A. No, sir.
Q. So you thought going to a tabloid after you left your employment at Neverland was perfectly consistent with your confidentiality obligations to Mr. Jackson, right?
A. I don't think I ever signed a confidentiality, sir.
Q. Sure about that?
A. I'm not for certain, but I don't recall that I ever did.
Q. Weren't you asked to?
A. I probably was. But at that time they didn't have one for me.
Q. At the time you and Mr. Abdool and Ms. McManus and your lawyer went to the tabloid, your lawyer was trying to negotiate to get money from Mr. Jackson, wasn't he?
MR. SNEDDON: I'm going to object. Lack of foundation and it assumes --
THE COURT: Foundation; sustained.
Q. BY MR. MESEREAU: At the time you and Mr. Abdool and Ms. McManus and your lawyer went to a 5251

1 tabloid to give a story about Mr. Jackson, do you
2 know whether or not your lawyer was trying to
3 negotiate money from Mr. Jackson?
4 A. No, sir.
5 Q. Do you know whether or not your lawyer was
6 trying to pressure Mr. Jackson by threatening bad
7 publicity?
8 A. No, sir.
9 Q. Did you ever hear of anything like that
10 going on?
11 A. No, sir.
12 Q. Okay. So if that went on, you'd be shocked,
13 true?
14 A. Probably not, sir.
15 Q. Probably not?
16 A. I guess not, no.
17 Q. Did you ever explain to Mr. Jackson yourself
18 that you were having trouble making ends meet
19 financially?
20 A. No, sir.
21 Q. Did you explain to anyone at Neverland about
22 that before you left?
23 A. No, sir.
24 Q. All right. Without getting into any of your
25 discussions with your lawyer, who of your group
26 first went to that attorney?
27 A. Which attorney, sir?
28 Q. Ring. Mr. Ring. 5252

A. Who first went to Mr. Ring?
Q. Yes.
A. Of us?
Q. Of you. Excuse me, let me rephrase the question. Make it clearer.
You, Mr. Abdool, Ms. McManus sued Mr. Jackson, correct?
A. Yes, sir.
Q. You were represented by a lawyer in Santa Barbara named Mr. Ring, correct?
A. Yes, sir.
Q. And he represented you throughout that six-month trial that you lost, correct?
A. Yes, sir.
Q. Who first approached Mr. Ring about trying to get money from Mr. Jackson?
A. We all did, sir.
Q. Together?
A. We hired him, yes, sir.
Q. Okay. Do you know how you found out about him?
A. I don’t recall, sir.
Q. Was he the only lawyer you talked to, or did you talk to some others?
A. I believe he was the only one we talked to, yes, sir.
Q. Do you recall whether you ever told anyone, “Mr. Jackson promised me if I did a good job, I 5253

1 would have a job at Neverland forever”?
2 A. No, sir.
3 Q. Did he ever say anything like that to you?
4 A. No, sir.
5 Q. Did anyone who hired you at Neverland?
6 A. No, sir.
7 Q. Okay. You met with Prosecutor Sneddon on
8 April 6th, correct?
9 A. Yes, sir.
10 Q. Was anyone else at the meeting?
11 A. Yes, sir.
12 Q. Who?
13 A. Russ Birchim.
14 Q. Where did the meeting take place?
15 A. Here in Santa Maria.
16 Q. And who arranged the meeting?
17 A. I believe it was Mr. Sneddon.
18 Q. Did he call you on the phone?
19 A. Yes, sir.
20 Q. Did he tell you where to meet?
21 A. Yes, sir.
22 Q. How long was the meeting?
23 A. Probably less than an hour.
24 Q. Did you discuss anything you were going to
25 say today?
26 A. I believe so, yes, sir.
27 Q. Did Mr. Sneddon tell you what questions he
28 was going to ask you today? 5254

A. Yes, sir.
Q. Did you tell him what answers you were going to give to those questions?
A. No, sir.
Q. Did you tell him anything about how you were going to respond?
A. I just told him that I would speak the truth.
Q. That's it?
A. Yes, sir.
Q. How long was the meeting?
A. Probably about -- less than an hour.
Q. So during the portion of that hour that you spoke, all you ever said was, "I'll tell the truth, I'll tell the truth, I'll tell the truth," or words to that effect?
A. No, sir. No, sir.
Q. Okay. He told you what questions he was going to ask you, correct?
A. I believe so, yes, sir.
Q. You told him what your responses were going to be, right?
A. Yes, sir.
Q. When was the -- excuse me.
Before that meeting, when was the last time you had met with anyone from the prosecuting office here?
A. I didn't meet with anybody. 5255

Q. Did you talk with anyone on the phone?
A. Yes, sir. I was --
Q. Who was that?
A. I believe it was a secretary from Mr.
Sneddon's office.
Q. And what was that discussion about?
A. When I was supposed to be down here and how
to get -- how to get to Santa Maria.
Q. How many meetings have you had with any
representative of the sheriff's department in total
to talk about your testimony?
MR. SNEDDON: Your Honor, I'm going to
object as vague as to time, a time period.
MR. MESEREAU: I'll rephrase it.
THE COURT: All right.
Q. BY MR. MESEREAU: In the last year, how many
meetings have you had with anyone representing the
Santa Barbara Sheriff's Department to talk about
this case?
A. I haven't, sir.
Q. How about phone calls?
A. No, sir.
Q. All right. You're aware of Mr. Jackson
going on tour -- excuse me. Let me rephrase it.
You're aware that Mr. Jackson periodically
went on tour while you worked at Neverland, true?
A. Yes, sir.
Q. And it was your understanding he always had 5256

bodyguards with him, correct, on tour?
A. I understood that, yes, sir.
Q. Okay. You knew he was extremely concerned about his security, right?
A. His bodyguard security or security on the ranch?
Q. Well, Mr. Jackson was extremely concerned about security on the ranch, wasn't he?
A. I don't know, sir.
Q. You don't know?
A. No, sir.
Q. Even with these intruders, you're not sure if he was concerned?
A. Well, I'm sure he was concerned, but he was never there when we did apprehend them.
Q. Okay. You knew he had concerns about his personal security when he went on tour, right?
A. Oh, yes, sir. Yes, sir.
Q. And at all times that you worked on the ranch, you knew he had personal bodyguards when he went on tour, right?
A. When he went on tour, yes, sir.
Q. You knew he had personal protection when he went other places for other reasons, true?
A. I assume so, sir. I don't know.
Q. Do you remember complaining that Mr. Abdool got a raise when you didn't?
A. No, sir. 5257

Q. Never happened?
A. No.
Q. When you left Neverland, you just stopped showing up for work, right?
A. Yes, sir.
Q. You stopped showing up for work after you met with Attorney Ring, correct?
A. Probably so, yes, sir.
Q. You were disappointed that you weren't getting more money from tabloids, weren't you?
A. No, sir.
Q. Never complained to anybody about that?
A. No, sir.
Q. The first incident you claim you saw Mr. Jackson improperly touch a young man was when?
A. I don't recall. Between '92 and '93, I believe. I'm not for certain.
Q. Do you recall ever telling any representative of law enforcement the month or the year?
A. No, sir. I don't -- no.
Q. And what shower are you claiming Mr. Jackson used when you say you looked in a shower and saw him acting inappropriately?
A. It was the outside rest rooms by the rec room.
Q. There were two of them, right?
A. Two rest rooms? 5258

Q. Yes.
A. There was a women's and a men's room, I'm sorry.
Q. And which one do you claim you saw Mr. Jackson in?
A. In the men's room, sir.
Q. Had you seen him in that men's room before?
A. Yes, sir.
Q. Okay. By the way, when you went to the Santa Barbara Grand Jury, you didn't tell them everything you said today, did you?
A. Yes, sir.
Q. Everything?
A. Yes, sir.
Q. Did you tell them everything you've told Mr. Sneddon?
A. Well, that one incident that I recalled I didn't. I didn't bring that up, no, sir.
Q. How long were you in front of a Santa Barbara Grand Jury?
A. Could have been a couple hours.
Q. And at some point, you called to see if anybody had charged Mr. Jackson with anything, didn't you?
A. No, sir.
Q. Never asked anyone?
A. No, sir.
Q. Never asked anyone in the sheriff's 5259

department?
A. No, sir.
Q. Never asked Mr. Sneddon?
A. No, sir.
Q. To this day you've never asked that
question, right?
A. No, sir.
Q. All right. When did you first learn Blanca
Francia had sold a story to Hard Copy?
MR. SNEDDON: Your Honor, I'm going to
object. That question has been asked and answered
and that assumes facts not in evidence.
MR. MESEREAU: I'll rephrase it.
THE COURT: All right.
Q. BY MR. MESEREAU: Did you ever learn that
Blanca Francia had told a story for $20,000 to the
T.V. show Hard Copy?
A. No.
MR. SNEDDON: Object. Asked and answered.
THE COURT: All right. He answered it. It's
"No." Next question.
Q. BY MR. MESEREAU: Did you ever learn she had
sold a story to Hard Copy, without knowing the
amount she got?
A. Yes, sir.
Q. When did you learn that?
A. Probably on the news.
Q. On the news when? 5260

A. I don’t recall, sir. It was -- it was
public knowledge.
Q. Did you see the show?
A. No, sir.
Q. Did you hear about it right after it
appeared on television?
A. No, sir.
Q. Were you employed when that was on
television?
A. No, sir.
Q. Where were you working at that point?
A. Where was I working? That’s a good
question. I believe I was already in Nevada by that
time.
Q. And what were you doing there?
A. I was a substitute teacher at a high school
and junior high.
Q. What year was this?
A. ‘96, ‘7, ‘8.
Q. Do you remember learning that security
guards at the Jackson home in Encino had sold
stories for $100,000?
A. No, sir, I didn’t know anything about that
place.
Q. Never heard anything about that?
A. Well, I know they had security guards, but I
never heard anything.
Q. Did you hear anything about security guards 5261

at the Encino home selling a story for $100,000?
A. No, sir.
Q. All right. Ever know someone named Quindoy?
A. I want to say that the Quindoys -- I believe they were chefs, I believe, but I'm not positive.
Q. They were what?
A. I believe they were cooks or chefs there at some property.
Q. Did you know them?
A. No, sir.
Q. Ever talk to them?
A. No, sir.
Q. Did you know they had tried to sell stories to tabloids about Mr. Jackson?
A. No, sir.
Q. Had you ever heard anything about that as you sit here today?
A. Probably have, but I don't recall.
Q. Okay. Now, at some point you claimed you were improperly subjected to electronic surveillance at Neverland, right?
A. Could you be a little bit more specific, sir?
Q. Sure.
MR. SNEDDON: Your Honor, I'm going to object. I'm going to object because of the 403 ruling, but more specifically because there are multiple defendants in the causes of action. It may 5262

be different as to different individuals.
MR. MESEREAU: I'm only talking about him,
Your Honor. His claims against Mr. Jackson.
THE COURT: I'm going to allow the question,
but I'm going to do so assuming it's not related to
specific allegations in the Complaint, which I
already said you can't directly go into.
MR. MESEREAU: Okay. Well, there were
such -- there were such claims, Your Honor.
THE COURT: I know, but we're not
relitigating that issue. But he could have made a
claim or his attorney could have made a claim.
You're asking him not about claims his attorney
made, but claims that he made.
MR. MESEREAU: Yes, I am.
THE COURT: I'm going to allow the question
with that understanding.
MR. MESEREAU: Thank you, Your Honor.
THE COURT: But you probably have to read it
back to him.
Do you remember the question?
MR. MESEREAU: I can rephrase it.
THE WITNESS: No.
MR. MESEREAU: I'll withdraw it.
Q. Do you remember claiming that you were
emotionally distressed because you thought your
telephone conversations were listened in to at
Neverland? 5263

A. Yes, sir.
Q. And you never knew whether or not there was a tap on any phone, correct?
A. Yes, I did, sir.
Q. Are you saying you did know there was a tap?
A. Yes, sir, I knew that they had equipment where they were listening in.
Q. Do you remember testifying under oath you didn't know if your phone was tapped?
A. At home or at the ranch, sir?
Q. Either place.
A. Yes, sir.
Q. Did you ever state under oath you didn't know whether your phone was tapped?
MR. SNEDDON: Your Honor, I object to the question as vague as to place.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You claim you had been emotionally damaged because someone listened in to your calls at Neverland, right?
A. Emotionally damaged. Well, I probably -- probably didn't say that, but I was upset because they were listening to my personal phone calls, sir.
Q. Okay. And your basis for saying that was that somebody had told you that was going on, right?
A. No, sir, I knew it was going on.
Q. You had no knowledge of electronic surveillance at the time, did you? 5264

A. Yes, sir, I did.
Q. Did you have a check done on the phones?
A. No, sir.
Q. When is the last time you talked to any tabloid about this case?
A. I have not, sir.
Q. You haven't?
A. I haven't talked to anyone.
Q. Are you planning to go to a tabloid after you testify?
A. No, sir. I just want to go home.
Q. Did you make a complaint that your employee file was unfairly looked at at Neverland?
A. Yes, sir.
Q. And who did you think had unfairly looked at your employee file?
A. The OSS, sir.
Q. That's Mr. Jackson's personal security guards?
A. Yes, sir.
Q. Did you have any idea why they were suspicious of you?
A. No, sir.
Q. They were, weren't they?
A. I don't know, sir.
Q. Did you ever talk to them about why they wanted to see what was in your personnel file?
A. Yes, I approached them. 5265

Q. This was around the time you went to a tabloid, wasn't it?
A. No, sir.
Q. This was around the time you went to Mr. Ring, wasn't it?
A. No, sir.
Q. It was very close to the time you left employment at Neverland, wasn't it?
A. I believe so, yes, sir.
Q. Do you remember saying you thought Mr. Jackson should compensate you for the rest of your life?
A. No, sir.
Q. Would it refresh your recollection to show you your deposition transcript?
A. Yes, sir.
MR. MESEREAU: May I approach?
THE COURT: Yes.
THE WITNESS: Where is the beginning? Oh, I must have, sir.
Q. BY MR. MESEREAU: Have you had a chance to look at that page in your deposition?
A. Yes, sir.
Q. Does it refresh your recollection that you testified under oath that you thought Mr. Jackson should compensate you for the rest of your life?
A. I must have said that, yes, sir, because it's on there. 5266

Q. Now, was it the policy at Neverland to notify the local sheriffs if an intruder was caught on the property?
A. Yes, sir, that's correct.
Q. Did you personally notify the sheriffs at any time about an intruder being on the property?
A. No, sir.
Q. Do you recall you personally apprehending any intruders?
A. Myself and Abdool, yes, sir.
Q. And what happened?
A. There was an intruder that came behind the pool area. It was a reporter. And we just apprehended him and took him down to the front gate and probably the security at the gate called the sheriffs.
Q. The pool area is right next to Mr. Jackson's house, isn't it?
A. Around the area, yes, sir.
Q. And how many people did you apprehend on that occasion?
A. One. One, sir.
Q. How far did that intruder have to travel to get to the pool area?
A. I don't know which direction he came in, sir. Could have been -- could have been a mile, two miles, three miles. I don't know, sir.
Q. And you also were involved in some other 5267

situations where intruders tried to get to Mr. Jackson, correct?
A. Yes, sir.
Q. And please describe those events.
A. Kind of vague, but I believe there was two -- two young people, a male and a female, I believe, and they were up by -- they were up by the -- by the theater.
Q. The theater would be up near the zoo area?
A. Yes, sir.
Q. And who caught them?
A. I believe it was mobile. I don't know who it was that was on mobile that evening, that night, but it was mobile patrol.
Q. Did you ever steal a watch from Mr. Jackson?
A. No, sir.
Q. Were you ever accused of that?
A. No, sir.
Q. You mentioned candy bars earlier, remember?
A. Yes, sir.
Q. Do you think the jury awarded Mr. Jackson $25,000 against you because you took candy bars?
A. That's what --
MR. SNEDDON: I'm going to object as argumentative.
MR. MESEREAU: I have no further questions, Your Honor.
THE COURT: Redirect? 5268

MR. SNEDDON: Yes.

REDIRECT EXAMINATION

BY MR. SNEDDON:

Q. All right. Let's go back just for a second. Mr. Chacon, were you subpoenaed to be here this morning?

A. Yes, sir.

Q. You're under subpoena?

A. Yes, sir.

Q. Did you want to come testify?

A. No, sir.

Q. When you testified before the grand jury, were you under subpoena?

A. Yes, sir.

Q. Did you want to testify?

A. No, sir.

Q. Prior to your appearance before the grand jury, you told the ladies and gentlemen that you met with attorneys for Mr. Jackson; is that correct?

A. Yes, sir.

Q. And with regard to that conversation, did they want to know what you were going to say?

A. They did.

Q. And what did you tell them?

A. I said that I got subpoenaed, and if I got subpoenaed, that I would just speak the truth, but I didn't tell them what I knew, but they wanted to 5269

know.
Q. They wanted to know, but you wouldn't tell them?
A. Yes, sir.
Q. But you told them you were going to tell the grand jury the truth?
A. Yes, sir.
Q. And did you do that?
A. Yes, sir.
Q. Now, with regard to Mr. Mesereau saying that you added something to the events that occurred yesterday when you and I were talking, do you recall him asking you that question?
A. Yes, sir.
Q. The new information you provided yesterday had nothing to do with the two events you've described to the jury, had they?
A. No, sir.
Q. There was nothing that changed about that, was there?
A. No, sir.
Q. In fact, the event that you indicated -- there was -- something that you remembered was something you were told by another person; wasn't that correct?
A. Yes, sir.
Q. And who was that other person?
A. Abdool. 5270

Q. It was in no way connected to the testimony you gave concerning the two incidents you observed?
A. No, sir.
Q. Now, with regard -- just so the jury has a clear indication of the sequence here, you were subpoenaed to appear before the Santa Barbara County Grand Jury, correct?
A. Yes, sir.
Q. Now, when you actually gave your statement under oath, was there a line of jurors like this in the room?
A. Back in ninety --
Q. '94, when you came in.
A. Yes, sir.
Q. Now, how long after that was it that Mr. Ring became involved in the civil lawsuit? Let me put it this way: After you appeared before the Santa Barbara Grand Jury and gave a statement under oath, do you recall that?
A. Oh, yes, sir.
Q. And you went back to work at the ranch, did you not?
A. Yes, sir.
Q. And you worked at the ranch, Neverland Valley Ranch, for a while before you left there, correct?
A. Probably a month or so, or two. I'm not positive. 5271

Q. Was it at that point that you became
involved in the lawsuit with Mr. Ring?
A. Yes, sir.
Q. Whose idea was it to go to the tabloid for
the story?
A. Well, we probably talked about it, but we
talked to Mr. Ring about it. I guess it was all of
us in general.
Q. After you -- Mr. Mesereau asked you about
your salary at the ranch. Do you recall that?
A. Yes, sir.
Q. And you spoke about being dissatisfied with
the wages that you were getting --
A. Yes, sir.
Q. -- compared to some people that had been
hired afterward, correct?
A. Yes, sir.
Q. After your conversations with Mr. Sanger and
Steve Cochran about your grand jury appearance, were
you offered a raise?
A. Yes, sir, I was.
Q. And it was before your testimony actually
occurred before the grand jury, correct?
A. Yes, sir.
Q. So it was in between the time they found out
you were going and the time that you actually
appeared they offered you a raise?
A. Yes, sir. 5272

Q. And Mr. Kassim also, right?
A. Yes, sir.
Q. Actually, it's Mr. Abdool.
A. Yes, sir.
Q. Now, during the course of the -- let me ask you this: After you testified before the grand jury and gave your statement under oath about what you saw happen on those two incidents - okay? - did you receive threats?
A. Oh, yes, sir.
Q. In what form?
MR. MESEREAU: Objection; beyond the scope.
THE COURT: Sustained.
MR. SNEDDON: Judge, it's what led to the lawsuit. And counsel was allowed to go into that.
THE COURT: All right. With that representation, I'll change my ruling.
THE WITNESS: Could you --
MR. SNEDDON: Yes.
Q. You said you were threatened. In what form?
A. Verbally, and -- well, verbally, and somewhat physically by someone touching their -- Tony Coleman touching his weapon.
Q. Tony Coleman was who?
A. He was OSS.
Q. All right. Would you describe to the jury -- if you have to stand up, do it. Describe to the jury what Mr. Coleman did. 5273

A. We were in the security office, and we were arguing about an intruder that came in, and he wanted to do it his way. And I said, “If you do it that way, we’re going to” -- “it’s not the procedure.”
And then he says, “Well, I’m going to do it my way because I’m here to oversee you.” And he touched -- he pulled his coat back and he touched his weapon, and he says, “I’m in charge here.” I believe that’s the words he used.
Q. Did he at any other time ever use his weapon to indicate a threat towards you?
A. No, sir, that was about the first time.
Q. Did you ever receive any phone calls of any kind that were threatening?
A. Yes, sir.
Q. Did you report those to law enforcement?
A. Yes, I did, sir.
Q. How many occasions did that occur?
A. Several times. One time when we first started, somebody says --
MR. MESEREAU: Objection; nonresponsive
THE COURT: After “several times,” sustained.
Q. BY MR. SNEDDON: All right. Tell us about those threats that you received.
A. The first time I received it, they said, “I’m going to kill you.”
MR. MESEREAU: Objection; hearsay. 5274

MR. SNEDDON: Your Honor, goes to the state of mind and to the reason for the lawsuit.
THE COURT: I'm going to overrule the objection as to state of mind.
Q. BY MR. SNEDDON: Go ahead.
A. Someone called and said, "I'm going to kill you," and hung up. And then other times we had calls at the house where they would either laugh or wouldn't say words, but we knew that someone was -- I believe it was OSS behind this.
Q. Did you as a result -- did you take these things seriously?
A. Oh, yes, sir.
Q. Did you approach anyone with regard to obtaining a gun permit?
A. Yes, sir.
Q. And who did you approach?
A. I asked Mr. Birchim and yourself for a gun permit. So I carried a concealed weapon permit for about two years, I believe it was.
Q. You indicated that you may have asked Sergeant or now Commander Birchim for money for your wife --
A. Yes, sir.
Q. -- do you recall?
Do you remember why that was?
A. Yes, sir.
Q. Why was that? 5275

A. Well, my wife's sister-in-law had just died, and --
Q. That's all right, I'll withdraw the question. That's okay. It's not important. Mr. Mesereau asked you about - we'll turn to a subject a little easier - about my conversation with you yesterday --
A. Yes, sir.
Q. -- with Mr. Birchim being there.
A. Yes, sir.
Q. And you told Mr. Mesereau how long the conversation lasted, correct?
A. Yes, sir.
Q. Was Mr. Birchim present during the entire conversation?
A. Yes, he was.
Q. Were there portions of time before Mr. Birchim got there that you and I talked a little bit?
A. Yes, sir.
Q. Did we talk about anything about this case?
A. No, sir. We talked about my military experience, and that you knew some people that I knew where I was born and raised.
Q. Had nothing to do with the case during the time Birchim wasn't there?
A. No, sir.
MR. MESEREAU: Objection; asked and 5276

answered.
THE WITNESS: No, sir.
Q. BY MR. SNEDDON: Now, when we were talking
yesterday --
THE COURT: Sustained. Go ahead.
(Laughter.)
Q. BY MR. SNEDDON: When we were talking
yesterday and Mr. Mesereau asked you did I tell you
what questions I was going to ask you today, do you
recall him asking you that question?
A. Yes, sir.
Q. What was the question that I actually asked
you; do you remember?
A. I believe it was the incidents that took
place, the two incidents that happened on the ranch.
Q. And I asked you just to describe them in
your own words to me?
A. Yes, sir.
Q. And Sergeant -- or Commander Birchim was
there during that entire time?
A. Yes, he was.
Q. Mr. Mesereau mentioned something about an
individual called Victor Gutierrez. Do you remember
that?
A. Yes, sir.
Q. Were you ever paid any money by Mr.
Gutierrez?
A. No, sir. 5277

Q. Did you ever give him a statement at all?
A. No, sir.
Q. You indicated that the individuals who were on the ranch that were armed were called the OSS. Was that their official name, or was that a name that the security staff gave them?
A. I believe that's -- it was used for them as a short title. Office of Special Services, but they used it as -- just call them OSS.
Q. And with regard to -- you told the jury that they interfered with you on how you did your job. In what respect? I mean, what was the tension or the friction between the two of you?
A. They just -- they just interfered in every aspect of our duty as security there. They would break the beams, the security beams, and they would cause us to run out there thinking it was an intruder. They would come by and laugh, and just make jokes, and/or sit out in their vehicle and stare at us inside the security office.
Q. With regard to the lawsuit itself that Mr. Mesereau has asked you a number of questions about, were you ever consulted about the amount of money that was going to be sued for?
A. No, sir.
Q. Whose judgment did you leave that decision?
A. Mr. Ring.
Q. Did you legit -- did you feel, yourself, 5278

that you were entitled to some money from Mr. Jackson because of the way you were treated on the ranch?
A. Yes, sir.
Q. Do you still feel that way?
A. Yes, sir.
MR. MESEREAU: Objection. Move to strike; relevance.
THE COURT: Sustained; stricken.
Q. BY MR. SNEDDON: You told the jury that you knew that you were being -- your telephones on the ranch were being monitored, correct?
A. Yes, sir.
Q. How did you know that?
A. It was common knowledge that -- in the main office where Sandy Domz worked at, there was a computer paper printout that -- you could hear, and it printed out the phone calls as they were made, either going out or coming in.
Q. Now, just a couple of more questions. With regard to the lawsuit, the trial, the civil lawsuit, were you -- or did you -- during that lawsuit, were you allowed or permitted to testify concerning the incidents you told this jury about this morning in that lawsuit?
A. No, sir. As a matter of fact, the judge said if I -- if we --
Q. You just weren't allowed to? 5279

A. No, sir.
Q. Okay. Mr. Chacon, is there anything that you've told this jury this morning about what you saw out there on those two incidents that is anything but the truth?
A. It's the truth, sir.
MR. SNEDDON: No further questions.

RECROSS-EXAMINATION
BY MR. MESEREAU:
Q. Mr. Chacon, the prosecutor has just asked you to talk about problems you had with the OSS, right?
A. Yes, sir.
Q. And the OSS was a nickname someone developed to call Mr. Jackson's personal bodyguards?
A. They themselves, sir.
Q. You wanted money to be awarded to you from a Santa Maria jury because of your problems with the personal security guards of Mr. Jackson, correct?
A. Yes, sir.
Q. Your claims were rejected, true?
A. Yes, sir.
Q. You also claimed at the time $16 million wasn't enough for you, right?
A. I probably did, sir. Yes, sir.
Q. The prosecutor just asked you if you knew anything about the amounts you were seeking, and of 5280

course you did, right?
A. Yes, sir.
Q. You wanted money because you claim that people were calling your home and hanging up, correct?
A. That was part of it, sir, yes, sir.
Q. And a Santa Maria jury rejected that claim, correct?
A. Yes, sir.
Q. You said that someone named Coleman had put his hand on his gun because he didn't like the way you wanted to handle an intruder; is that correct?
A. No, because he wanted to handle it.
Q. He was a personal security guard, correct?
A. OSS. Not a security guard.
Q. He was carrying a -- well, this group you call the OSS, they're bodyguards for Mr. Jackson, right?
A. Yes, sir, they are.
Q. And they were carrying weapons, correct?
A. Yes, sir.
Q. And he was concerned about the intruder, correct?
A. No, sir.
Q. You sued also claiming you should get money because of what Mr. Coleman did on that day, correct?
A. He threatened me, yes, sir. 5281

Q. And that was rejected by a Santa Maria jury as well, correct?
A. Yes, sir.
Q. And you wanted money because you said Mr. Jackson stared at you on occasion, correct?
A. No, sir.
Q. Why did you say it?
A. Just to say it.
MR. MESEREAU: No further questions.
MR. SNEDDON: No questions, Your Honor.
THE COURT: All right. Thank you. You may step down.
Call your next witness.
MR. ZONEN: Call Adrian McManus to the stand.
THE COURT: Come to the front of the courtroom, please.
When you get to the witness stand, please remain standing. Face the clerk over here and raise your right hand.

ADRIAN MARIE McMANUS
Having been sworn, testified as follows:

THE WITNESS: Yes.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: Adrian Marie McManus; 5282

A-d-r-i-a-n; M-a-r-i-e; M-c-M-a-n-u-s.
THE CLERK: Thank you.
MR. ZONEN: May I proceed?
THE COURT: Yes.

DIRECT EXAMINATION
BY MR. ZONEN:
Q. Ms. McManus, good morning.
A. Good morning.
Q. Without telling us the location or the name of where you're working, describe the kind of work you're currently doing.
A. I work in a jewelry department where I sell diamonds.
Q. Is this a department store?
A. Yes, sir.
Q. Is it in the Santa Maria area?
A. Yes.
Q. How long have you been working at that department store?
A. Seven years in July.
Q. You work in the diamond department, do you?
A. Yes.
Q. All right. There is such a thing as a diamond department?
A. Yes.
Q. They sell raw diamonds or finished diamonds or jewelry? 5283

A. Fine diamonds, jewelry.
Q. All right.
A. It's actually a lot of diamonds.
Q. Okay. Have you worked in that department the entire time?
A. No.
Q. Have you worked in other departments in that store as well?
A. Yes.
Q. Prior to that, what kind of work were you doing?
A. I was a merchandise assistant for the cosmetic department.
Q. At the same store?
A. Yes.
Q. For what period of time?
A. Probably the beginning of my employment. Maybe about four years.
Q. And prior to that, what kind of work were you doing?
A. Do you mean like after that or before that?
Q. Before working with this store.
A. I worked for Sears, and I ran -- I was in the cosmetic department.
Q. Did you ever work for Michael Jackson?
A. Yes.
Q. Do you see Michael Jackson in this courtroom? 5284

A. I don’t have my glasses. I forgot them upstairs.
Q. How far can you see?
A. I can’t see real far.
Q. Can you see me?
A. Yeah, blurry.
Q. I won’t ask that question, then. Can you read, in the event we need to show you some documents?
A. No, I need to get my glasses.
Q. We’re going to have a break in a few minutes. I’ll reserve all those questions until we have that break.
You did work for Michael Jackson at some point, did you not?
A. Yes.
Q. For what period of time did you work for Michael Jackson?
A. From, I think, August 29th of 1990 through July 31st of 1994.
Q. In what capacity? What kind of work did you do for Mr. Jackson?
A. At the beginning I was just a maid, regular housekeeper. Nine months later I was cleaning his bedroom.
Q. And did you continue that job for the duration of your employment?
A. Yes. 5285

Q. Were you the only person cleaning his bedroom?
A. Yes.
Q. Tell me how that worked. Why were there not other people involved in cleaning his bedroom as well?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. ZONEN: What were you told about who would be cleaning his bedroom?
A. I was just told that I was flexible and that I was the one to clean his bedroom.
Q. And that was that entire time after a few months after you commenced working for Mr. Jackson?
A. Yes.
Q. So it was early '91?
A. I just know it was nine months after, because I started in '90, and --
Q. Now, up to that point, you were responsible for cleaning other locations at Neverland; is that correct?
A. Yes.
Q. What were those other locations? Tell us what your job included.
A. Before that time?
Q. Yes.
A. Cleaning the rec room, the ranch house, the guest units, the hill house, the main house, except 5286

his bedroom at that time.
Q. Do you know who the person was who was responsible for cleaning his bedroom before you?
A. Blanca Francia.
Q. And did you know Blanca Francia?
A. Yes.
Q. Were you the one who took over that job when she left?
A. Yes.
Q. Did you take over that job as soon as she left?
A. Yes.
Q. Describe to us what those responsibilities included, cleaning --
THE COURT: Let's take a break.
(Recess taken.)
THE COURT: Go ahead.
Q. BY MR. ZONEN: Thank you. Where we left off before the break, I was asking you about your responsibilities, once you assumed the position of being the personal maid for Michael Jackson.
And before I get to that, do you have your glasses?
A. Yes.
Q. Is Mr. Jackson here in the courtroom?
A. Yes.
Q. Okay. Could you identify him, please?
A. He's right here. 5287

MR. ZONEN: And the record should reflect.
THE COURT: Yes.
Q. BY MR. ZONEN: What were your
responsibilities as his personal maid?
A. To pick up after Mr. Jackson, anything to do
with his clothes, his -- washing his clothes, fixing
his bed, cleaning his bedroom.
BAILIFF CORTEZ: I'm sorry, can you speak
more into the microphone?
Q. BY MR. ZONEN: You have to stay fairly close
to the microphone to be able to be heard all the way
to the back of the courtroom, if you will.
Describe his bedroom suite for us, please.
A. It was a very big room. There was a second
level to it. There was a Jacuzzi on one side with a
bathroom. A closet. Inside that closet was a
secret closet.
The other side of the room there was a
bathroom also, and another walk-in closet, and there
was a stairway that led up to the second level.
Q. Were your responsibilities limited to that
suite?
A. At one time, yes.
Q. All right. What if Mr. Jackson was gone for
a while, if he was on tour, or out of town for a
period of time, what would you do?
A. I still had to pick up the room, as far as
keeping it dusted, and brassing, and cleaning the 5288

tub. There was still a lot to do.
Q. Were there responsibilities that went beyond the suite on those occasions?
A. Yes.
Q. Did Mr. Jackson have monkeys during that period of time, or apes, or chimps, or --
A. Yes.
Q. -- primates?
A. Yes.
Q. Were they living in his room?
A. They weren't living in his room, but they were brought into his room.
Q. Were there cages for them?
A. Some -- well, when I seen them, they were running around.
Q. Did you ever see cages in his room?
A. I don't recall seeing cages in the room.
Q. Were you, on occasion, required to tend to the monkeys or clean up after the monkeys?
A. Yes.
Q. And describe what that obligation was.
A. Well, there was a little monkey, a chimp, and --
MR. MESEREAU: Objection; relevance.
THE COURT: Relevance, Counsel?
MR. ZONEN: I'll withdraw the question. Let me move on.
Q. Were you the personal maid for the balance 5289

1 of time that you were there?
2 A. Yes.
3 Q. All right. Do you know a person by the
4 name -- or did you know a person by the name of Wade
5 Robeson?
6 A. Yes.
7 Q. Who was Wade Robeson?
8 A. He was a little boy that used to go to the
9 ranch, and he was from Australia.
10 Q. How old was he when you saw him at the
11 ranch?
12 A. I don't know exact. Maybe 10, 11.
13 Q. Now, you have a son, do you not?
14 A. Yes.
15 Q. And your son at that time was approximately
16 how old?
17 A. Maybe ten.
18 Q. About the same age as Wade Robeson?
19 A. Yes.
20 Q. Did your son ever come with you to Neverland
21 Ranch?
22 A. Yes.
23 Q. On many occasions?
24 A. Yes.
25 Q. Did your son know Wade Robeson?
26 A. Yes.
27 Q. Did they, on occasion, play together?
28 A. Off and on. 5290

Q. For what period of time did you see Wade Robeson there at the ranch; do you recall?
A. Are you talking about, like, months or --
Q. Well, for what period of time did Wade Robeson visit the ranch?
A. Are you talking about years or just the timing, like?
Q. From the earliest time that you saw him visit to, say, the last time you saw him visit, if you can recall, give us a sense of what period of time that was.
A. I would say probably 1992. I don't know how many months.
Q. And did you see him there for a long period of time?
MR. MESEREAU: Objection; vague.
THE COURT: Sustained.
Q. BY MR. ZONEN: How often did he visit during that period of time? In other words, how many separate times did he come, to your recollection?
A. There were a lot of times. Come maybe for a week or the weekend.
Q. All right. And that was my next question.
A. Sorry.
Q. How long would he stay when he did come?
A. Sometimes a weekend, sometimes maybe a little longer.
Q. And during that period of time, where did -- 5291

where did Wade Robeson stay when he was at the house, when he was at the ranch?
A. In Mr. Jackson's room.
Q. Were you the personal maid for Mr. Jackson during the entire time that Wade Robeson visited?
A. I believe so. Yes.
Q. Let me change that again.
During the period of time that you were the personal maid, was Wade Robeson visiting that entire time?
A. Yes.
Q. Okay. I think you said among your responsibilities were to pick up after Mr. Jackson and wash clothing. Do you have a recollection as to whether or not you saw Wade Robeson's personal possessions?
A. Sometimes.
Q. And I asked you where Wade Robeson stayed, and you said Mr. Jackson's room. Do you know where he stayed in the room?
A. In the same bed as Mr. Jackson.
Q. Okay. Were there other beds in Mr. Jackson's suite during that period of time?
A. Yes.
Q. Where were the other beds?
A. There was one upstairs in like -- I don't know if you'd call it -- in like a loft.
Q. Was that bed ever used? 5292

A. No.
Q. Do you have a recollection of ever changing sheets on that bed?
A. I did, you know, just to keep it kind of up, but not always.
Q. Do you have a recollection of anybody ever seeping in that bed; in other words, coming in and discovering that those sheets had simply been used, the bed had been used?
A. Yes.
Q. How often?
A. Maybe -- maybe once.
Q. During the entire time that you were the personal maid for Mr. Jackson?
A. I believe so.
Q. All right. Did you know Wade Robeson's parents, mother or father?
A. I don't ever remember meeting a father, but I remember the mother.
Q. And where did she stay when they were there?
A. In the guest unit.
Q. Did Wade Robeson have any brothers or sisters who came?
A. Not that I recall.
Q. Do you know if Wade Robeson's mother ever stayed in Mr. Jackson's residence?
A. No. I recall her in the guest units.
Q. Did you see Wade Robeson in Mr. Jackson's 5293

residence?
A. Yes.
Q. Do you know who Macaulay Culkin is?
A. Yes.
Q. Who is Macaulay Culkin?
A. He was a little boy that used to come to the ranch.
Q. Do you know during what period of time Macaulay Culkin came to the ranch?
A. 1990, maybe, through maybe ‘93.
Q. He was there for extended periods as well?
A. Yes.
Q. And by “extended periods,” what do we mean?
A. Sometimes a week. Sometimes longer.
Q. Did he visit frequently during that period of time?
A. Yes.
Q. Was he ever there during the period of time that Wade Robeson was there?
A. I can’t recall.
Q. Did Macaulay Culkin have brothers or sisters?
A. Yes.
Q. Do you know how many brothers or sisters he had?
A. I’m thinking maybe seven or eight.
Q. It was a large family?
A. Yes. 5294

Q. Did you ever meet his parents?
A. Yes.
Q. Would all of them come to the ranch on occasion?
A. Sometimes.
Q. Were there occasions when Macaulay Culkin came by himself?
A. Sometimes.
Q. And on those occasions when he came by himself, how long, typically, would he stay?
A. The weekend. Sometimes his parents would show up later and they'd be there maybe a week.
Q. How old was Macaulay Culkin when he was visiting the ranch during that period of time?
A. Maybe 11. 10 or 11 maybe.
Q. At the earliest -- you gave us a period of time that was over two or three years. What was the youngest age you remember seeing him, as best you can recall?
A. Maybe ten.
Q. Okay. Was Macaulay Culkin -- do you know him to be an actor?
A. Yes.
Q. Have you seen things that he's been in, movies or television?
A. Maybe one.
Q. Do you know where Macaulay Culkin stayed when he was at the ranch? 5295

A. In Mr. Jackson's room.
Q. And as I had asked previously, do you know where in Mr. Jackson's room he stayed?
A. In his bedroom, in his bed.
Q. And how do you know that?
A. Because when I would -- when I would go in the room the next day, there was just one bed that I had to fix.
Q. Do you know if Macaulay Culkin and Wade Robeson's visit would overlap on occasion, when both would be there at the same time?
A. Can you repeat that?
Q. I'm sorry?
A. Can you repeat it?
Q. If their visits would overlap, if they would be there at the same time. Do you have a recollection of seeing Macaulay Culkin and Wade Robeson there at the same time?
A. I could have.
Q. Do you know where Macaulay Culkin's family stayed when they were at the ranch?
A. Usually at the guest units.
Q. And the guest units were a separate building?
A. Yes.
Q. Do you know if his brothers or sisters ever stayed overnight in Mr. Jackson's personal residence, his personal suite? 5296

A. Not that I know of.
Q. Who is Jordan Chandler?
A. He's another little boy that used to come to the ranch.
Q. Do you know what period of time he used to come to the ranch?
A. Maybe '93.
Q. Was it for as long a period of time as Mr. Culkin, Macaulay Culkin came to the ranch?
A. No.
MR. MESEREAU: Objection; vague.
THE COURT: Sustained.
Q. BY MR. ZONEN: Can you tell us the period of time that Jordan Chandler visited at Neverland? In other words, at what time did it commence and at what time did it end, if at all, during your period of employment?
A. Maybe 1993 and maybe through '94. Maybe early, maybe late -- actually, maybe late '93.
Q. Who is Brett Barnes?
A. Another boy that used to come to the ranch.
Q. How old was Brett Barnes when he visited?
A. Probably maybe 11.
Q. For what period of time did Brett Barnes come to the ranch?
A. He was there quite a lot. Mid -- maybe 1993.
Q. Do you know approximately what period of 5297

1 time Brett Barnes would come and visit? In other
2 words, over what period of time, measured in months,
3 measured in years, measured in weeks, from the first
4 visit to the last?
5 A. I would -- I'm thinking maybe 1992 through
6 maybe 19 -- late 1993.
7 Q. When Brett Barnes came to the ranch, did he
8 come with family?
9 A. Yes.
10 Q. And who in his family did he come to the
11 ranch with?
12 A. With his mother and his sister.
13 Q. Did you ever meet Brett Barnes' father?
14 A. I don't believe there was a father in that
15 picture. I have never seen a father.
16 Q. Brett Barnes has a sister, you say, who
17 came?
18 A. Yes.
19 Q. How old was she?
20 A. I would say maybe 13.
21 Q. How frequently did Brett Barnes come to the
22 ranch during that period of time?
23 A. A lot.
24 Q. And by "a lot," what do we mean? Would it
25 be more than one visit a month?
26 A. Yes.
27 Q. And when he came, how long did Brett Barnes
28 stay? 5298

A. Sometimes -- sometimes a week. Sometimes
less than a week.
Q. Where did he stay when he came?
A. In Mr. Jackson's room.
Q. Where did he sleep when he was there?
A. In Mr. Jackson's bed.
Q. Do you have a recollection at any time
either fixing a bed for Brett Barnes that was
separate from Mr. Jackson's bed or cleaning up after
a bed separate from Mr. Jackson's bed?
A. No.
Q. I had asked you about Jordan Chandler. When
he came to Neverland Ranch, did he come with his
family?
A. Jordan came with his mother and his little
sister.
Q. Do you know how old the little sister was?
A. Maybe four.
Q. She was a small child?
A. Yes.
Q. Did you ever meet Jordan Chandler's father?
A. I never -- I never met -- I never seen his
father around there. I never met him.
Q. During the visits when Jordan Chandler came,
where did his mother and sister stay?
A. In the guest unit.
Q. And where did Jordan Chandler stay?
A. In Mr. Jackson's room. 5299

Q. Consistently?
A. Yes.
Q. Where did Jordan Chandler sleep when he was in Mr. Jackson's room?
A. In Mr. Jackson's bed.
Q. Now, do you have a recollection of these four boys being there at the same time, Macaulay Culkin, Jordan Chandler, Brett Barnes, and Wade Robeson?
A. Um, I -- I kind of recall Brett being there with Jordie, at the same time. And, you know, it could have been Wade also, when Brett was there.
Q. Would that have been a common occurrence?
MR. MESEREAU: Objection; vague.
THE COURT: Overruled.
You may answer.
THE WITNESS: Not always.
Q. BY MR. ZONEN: Do you understand -- not always?
A. Not always.
Q. Do you have a recollection of specific events of all of them being there together or the two or the three that you mentioned?
MR. MESEREAU: Objection; asked and answered.
THE COURT: Overruled.
You may answer.
THE WITNESS: I just recall seeing them 5300

there at the same time, Brett and Jordie.
Q. BY MR. ZONEN: Brett and Jordie?
A. Yes.
Q. Do you know how many times you saw Brett and Jordie there together?
A. At least two times.
Q. During the entire period of time that you worked as Michael Jackson's maid, personal maid, was it a frequent occasion that there would be one of those four boys there?
A. Yes.
MR. MESEREAU: Objection; vague.
THE COURT: Overruled. The answer was, "Yes." Next question.
Q. BY MR. ZONEN: Was there ever an occasion that one of those four boys was there and did not stay in Michael Jackson's bedroom and bed?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Was there ever an occasion that you personally witnessed during the time that you worked as his personal maid when any of those four boys stayed -- and you were on duty, where they stayed in the guesthouse and not in Mr. Jackson's bed?
A. No.
Q. As part of your obligations and responsibilities as the maid, did you clean up in 5301

the bathrooms?
A. Yes.
Q. Was there a Jacuzzi in the bathroom?
A. It wasn't in -- yes, but --
Q. Am I describing the room incorrectly or inaccurately?
A. Yeah, because it wasn't really attached. It was just one room where the Jacuzzi was, and off to the side there was a bathroom and a shower.
MR. ZONEN: Just one second.
Q. During the period of time that you were working as Mr. Jackson's personal maid, did you ever see behavior by Mr. Jackson toward any of these boys that concerned you?
MR. MESEREAU: Objection; vague.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes.
Q. BY MR. ZONEN: And which of the four boys are we talking about?
A. Macaulay Culkin, Brett Barnes and Jordie Chandler.
Q. All right. Let's begin with Macaulay Culkin. What is it that you saw that concerned you?
A. I was coming out of the bathroom by his bedroom, by Mr. Jackson's bedroom. I was cleaning that bathroom. And when I came out, I saw Mr. Jackson and Macaulay in the library, and Mr. Jackson 5302

was kissing him on his cheek, and he had his hand
kind of by his leg, kind of on his rear end.
Q. Did they know that you were there?
A. I don't know --
MR. MESEREAU: Objection; calls for
speculation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you announce your
presence to them?
A. No.
Q. Where were you at the time you witnessed
this?
A. I was coming out of the bathroom by Mr.
Jackson's bedroom.
Q. All right. Is that on the first floor?
A. Yes.
Q. Is that where you were?
A. Yes.
Q. Were they on the first floor as well?
A. Yes.
Q. Did you -- did you note that they were in
the room or had come into the room?
A. No.
Q. Were you surprised to see them?
A. Yes.
Q. Had you been cleaning in that room?
A. In the bathroom?
Q. Yes. 5303

A. Yes.
Q. How did you come upon them? How did that happen?
A. I was leaving the bathroom, and when I walked out of the bathroom, I looked up and I saw.
Q. How far away from you were they?
A. I don't know the feet. It was a little distance.
Q. Between the distance that you and I are at this moment?
A. Maybe a little further.
Q. All right. Let's say to the back rail over here, behind me?
A. Probably a little further. Maybe a little further.
Q. Second or third row?
A. Maybe second row.
MR. ZONEN: Okay. And for the record, could we say that's 30 feet, 25? The second row?
THE COURT: I'm not testifying.
(Laughter.)
Q. BY MR. ZONEN: How far do you think that is in feet? Do you have any way of knowing?
A. No.
Q. All right. You did not hear them come into the room?
A. No.
Q. When you got to the position where you saw 5304

them, were either of them looking at you?
A. No.
Q. Were either of them facing you?
A. No.
Q. And you testified that you saw Michael Jackson kissing Macaulay Culkin?
MR. MESEREAU: Objection; asked and answered.
THE WITNESS: Yes.
THE COURT: Just a moment.
THE WITNESS: Oh, I'm sorry.
THE COURT: The objection is sustained.
Q. BY MR. ZONEN: Where did he kiss him?
A. On the cheek.
Q. And where did he touch him?
A. Kind of like by his leg, and it went to his rear end.
Q. And how long did that last?
A. I don't know how long. I just walked off.
Q. And you say you walked off.
A. Yes.
Q. Walked off where?
A. I went to the laundry room.
Q. All right. Were you in a position where you could do that without being seen?
A. I believe so.
Q. All right. Did you leave the -- literally leave the suite? 5305

A. I was in the rest room and I left the rest room.
Q. Okay. Now, can you describe that for us, how you could do that without necessarily being seen or detected in his room? You didn't have to walk by them or anything?
A. No. They were at a distance, so I just walked through the hall.
Q. Did Mr. Jackson ever mention to you anything about that?
A. No.
Q. Did you ever mention anything to him about that?
A. No.
Q. Was that the first thing that you had seen in terms of behavior toward a child that caused you concern?
A. Yes.
Q. Did you see any other incidents that caused you concern in terms of Mr. Macaulay Culkin?
A. No.
Q. What was the next thing that you saw that caused you concern?
A. Brett Barnes.
Q. And what did you see?
A. Well, I was up in the video room, and Mr. Jackson had me taking videos out of the wall. There was -- the room was a video room. It was actually a 5306

soldier room. And he had me taking all of the videos out of the wall, and there was like -- I don't know what you call them, like wood things that would hold the videos, and they had, like, screws in the wall. So I was pulling those all out because he had heard that you could see down into his bedroom.
MR. MESEREAU: Objection; nonresponsive.
THE COURT: Sustained.
MR. MESEREAU: Move to strike.
THE WITNESS: So --
THE COURT: Just a moment. I'll strike from the point where she said, "So I was pulling those out."
Q. BY MR. ZONEN: All right. Why -- what were you pulling out from the walls?
A. Videotapes.
Q. Why were you doing that?
A. Because Mr. Jackson had heard that you could see down into his bedroom. There was like a little cubbyhole in the back of the walls up in that room, so he wanted to see if you could see down into his bedroom.
Q. So did you, in fact, remove videotapes?
A. Yes.
Q. Could you see down into the bedroom?
A. Yes.
Q. Did you show him that, or did he see that with you? 5307

A. He was in his room, and where I was at was above his room, so he came up with Brett Barnes to that room.
Q. He came up to the room?
A. Up to the video room with Brett Barnes.
Q. While you were there?
A. Yes.
Q. All right. And did you show him that spot while he was there?
A. Yes.
Q. All right. Now, when did you see him doing something with Brett Barnes?
A. After that?
Q. Yes. Was it right after that?
A. It was kind of right after that, yeah.
Q. And where was he?
A. They were walking back down the stairs, and they went down through the hall by his bedroom, and I kind of followed because it was very hot up there in that room. And I was on the landing after you get on the stairs, and I kind of looked over the landing, and he was walking away with Brett to his room, and I saw him put his hand on Brett's rear end, and he gave Brett a kiss on the cheek.
Q. In like fashion to what you described you had seen with Macaulay Culkin?
A. Yes.
Q. All right. Which of those incidents took 5308

place first, Macaulay Culkin or Brett Barnes?
A. Macaulay Culkin.
Q. How far away from them were you at that time? How far away from them? How far away?
A. With Brett?
Q. Yes.
A. Oh, gosh, not that far. Maybe from where I'm at to maybe the third row back.
Q. Okay. I'm done estimating distances, so we'll leave it at that.
All right. Is that the only incident that you saw with Brett Barnes?
A. Yes.
Q. Did you see an incident with anybody else?
A. With Jordan Chandler.
Q. And when was that?
A. Asking about the year?
Q. Relative to the incident that you saw with Brett Barnes.
A. God, I can't even think of the year. Probably '93.
Q. Was it toward the end of your employment there?
A. Maybe -- maybe -- a little, maybe.
Q. And what did you see?
A. I was up in Mr. Jackson's bedroom and I was -- I was on the second -- the loft area, and I was dusting. And I heard the chimes go off, so I 5309

knew somebody was coming into the bedroom.
Q. What does that mean, you heard the chimes go off? Where were there chimes?
A. There's like a sensor, like it rings. They're bells that ring when anybody's coming into Mr. Jackson's room, or if you leave the room, the chimes will go off.
Q. And when they go off, how long do they ring?
A. Until --
Q. If you walk through it, it will ring for how long?
A. For a while. For a little while, until I guess people are out of the area where you're seen.
Q. So once you clear, does it stop?
A. It will stop after, yeah.
Q. And the chimes going off meant what to you?
A. That somebody was coming into the room.
Q. All right. Was that an unusual occurrence while you were cleaning?
A. What, the chimes going off?
Q. Yes. Somebody coming into the room. If you were cleaning there during the day, would that startle you if that happened?
A. No.
Q. What did you do?
A. Well, I was upstairs, and I -- I heard talking, like voices. So I knew it was probably Michael and Jordie. 5310

Q. Now, “upstairs” means -- there’s a second bed up there?
A. Yes.
Q. Like a loft you said?
A. A loft, uh-huh.
Q. Were you cleaning at that time?
A. Yes.
Q. Okay. Do you know if the bedroom door was open when you heard the chimes?
A. I believe so.
Q. And what happened then?
A. I kind of looked down from the stairs, from the stairs up there a little, and I saw Mr. Jackson with Jordie, and they were changing their clothes. Like -- I figured they were at the water fort. And I looked down and I saw Mr. Jackson kissing on -- on Jordie.
Q. What part?
A. His cheek, and then his mouth, and his hand was on his crotch.
Q. What was Jordie wearing at the time?
A. He had pants on.
Q. How long did that last?
A. I -- when I saw that, I was quiet, and I can’t even say how long that lasted.
Q. What did you do?
A. I was kind of shocked, flushed, and I stood quiet where I was at. 5311

Q. You didn't say anything?
A. I didn't say nothing.
Q. For you to go and leave that room where the loft is, you would have to walk down the stairs, would you not?
A. Yes.
Q. Would you have had to have walked past them?
A. Yes.
Q. All right. What did you do?
A. I stayed up there very quietly, I didn't say anything. I stood very quietly. And I waited for them to leave the room.
Q. And did they leave the room?
A. Yes.
Q. How was Jordie Chandler dressed at the time?
A. I just remember he had pants on, and they were changing shirts. He had pants on and so did Mr. Jackson.
Q. And when you said his hand was on Jordie Chandler's crotch, on the outside of the pants or on the inside of the pants?
A. On the outside.
Q. Was he kissing him the entire time that you were watching?
A. From what I saw, yes.
Q. Where exactly were you at the time that you heard the chimes?
A. Upstairs in the top loft. 5312

Q. And do you know where in that room?
A. Kind of by the stairs. By the stairs. I was dusting the stairs.
Q. So right at the top landing?
A. Yes.
Q. Did you stay up there until Jordie Chandler and Mr. Jackson left the room?
A. Yes.
Q. Did you then go downstairs?
A. Yes. After I heard the chimes go off, I knew they had left, and I waited and then I left.
Q. How long after this happened did you leave your employment with Michael Jackson?
A. Well, I left July. I don't know, like, the months. I know I left July 31st of '94.
Q. Did you ever see any incidents involving Wade Robeson? You told us about Brett Barnes, and Jordan Chandler, and Macaulay Culkin. Did you ever see an incident involving Wade Robeson?
A. No.
Q. I started to ask you a bit ago about the Jacuzzi. There's a Jacuzzi that's located in the master bedroom suite. Describe for us where that is.
A. When you go into Mr. Jackson's room, right when you go down the steps, there's steps in his room, there's a rest room like on that side, like right-hand side, where if you go around his bed, 5313

there’s another area where there’s another rest
room, and there’s a Jacuzzi.
Q. How large?
A. Oh, God, it’s big. It’s big.
Q. Would it hold more than one person?
A. Yes.
Q. Comfortably?
A. Yes.
Q. Was water kept in that Jacuzzi all the time?
A. No.
Q. What were your responsibilities with regard
to cleaning the Jacuzzi?
A. I would have to clean the Jacuzzi off and
on, run the water in it. But there were times when
I had to let the water out of the Jacuzzi.
Q. All right. And were there things in the
Jacuzzi on occasion?
A. Yes.
Q. Like what?
A. Like Mr. Jackson’s undershorts, and a little
boy’s undershorts.
Q. Do you know which boys had been staying
there during that time?
A. A lot of the little boys were staying there
at that time.
Q. You wouldn’t know which boy’s it was, the
undershorts?
A. Brett -- it could -- Brett. Jordie. 5314

Macaulay. That happened frequently.
Q. They'd actually be in the Jacuzzi in the water?
A. They'd be in the water, or sometimes they'd be on the floor by the Jacuzzi.
Q. And these were underpants?
A. Yes.
Q. And you could tell the difference between the boy's underpants and Mr. Jackson's underpants?
A. Yes.
Q. Did you have to clean them?
A. Yes, I washed them.
Q. Did you, on occasion, wash the children's underwear as well?
A. At times, yes.
Q. If it was left behind?
A. Yes.
Q. You'd pick it up and wash it?
A. Yes.
Q. These four boys during the time that they were staying at Neverland, how did their behavior -- how was their behavior?
MR. MESEREAU: Objection; vague.
MR. ZONEN: As to "behavior" or as to "boys"? I'll object to the objection as vague. Or I'll reask the question.
THE COURT: Well, it's compound, I think.
MR. ZONEN: I'll reask the question. 5315

THE COURT: All right.
Q. BY MR. ZONEN: During the period of time that you were working as Mr. Jackson's personal maid, did you have an opportunity to observe the behavior of the children who were frequent visitors at Neverland Ranch?
A. Yes.
Q. And did that include the four boys that we're talking about so far?
A. Yes.
Q. Did it include other children who were frequent visitors at Neverland Ranch?
A. Yes.
Q. All right. And I'm not asking you questions about busloads of kids who would arrive for a day and leave at the end of the day. I'm asking about the ones who were Mr. Jackson's personal guests and who stayed for periods of time. Do you understand that?
A. Yes.
Q. All right. Was there anything about that behavior that was unique, in your mind?
MR. MESEREAU: Objection. Vague; relevance; and leading.
THE COURT: The thing I'm having a problem with is not the vague, but the fact that you're asking about all of the boys as oppose -- as to their behavior. 5316

MR. ZONEN: I'll make that easier.
Q. Macaulay Culkin, what was his behavior like when he was at Neverland Ranch?
A. He was very, very wild.
Q. Describe what you mean by that.
A. For us maids?
Q. Yes.
A. He was a lot of work when he -- when he was around there.
Q. What does that mean, "a lot of work"?
A. He was destructive. I mean, throwing popcorn at Mr. Jackson. Soda, from the top, being thrown at Mr. Jackson's head.
Q. The top of what?
A. At the top of the theater. Like a projection room way up on the top.
Q. Did you actually witness that?
A. Yes.
Q. So there's apparently two stories at the theater?
A. Yes.
Q. And is the upper story open in such a way that you can actually have contact with somebody below you?
A. Yes. They will -- yes.
Q. Open in what way?
A. There were windows up in the top-top. I don't know if you call it a -- I don't know if it 5317

was called maybe a viewing room. And if you were up there, you had to take a stairway to get up to the top, and you could open these windows.
Q. What did you see him do?
A. He threw sodas. I had just made popcorn, because he asked for popcorn, and he wanted a soda. So I gave it to him. And he went upstairs, and he dumped it on Mr. Jackson's head, along with the popcorn.
Q. All right. Did that create a mess?
A. Yes.
Q. Mess for you to clean up?
A. Yes.
Q. Was that a unique event with regard to Mr. Macaulay Culkin?
A. Was it unique?
Q. Well, were you always cleaning up after him?
A. Yeah, but certain kids made it worse. And he was one of them.
Q. All right. Which other kids were a problem?
A. Jordie Chandler.
Q. What did Jordie do?
A. Um --
Q. Before I get to Jordie Chandler, let me ask you another incident about the popcorn and the soda. What did Mr. Jackson say to Macaulay Culkin when he poured popcorn and soda from the second story on top of him? 5318

MR. MESEREAU: Objection; foundation.
THE COURT: Overruled.
You may answer.
Q. BY MR. ZONEN: Go ahead.
A. It was like a joke. It was funny.
Q. He didn't discipline him?
A. No.
Q. He didn't tell him, "That's inappropriate"?
A. No.
Q. Nor did he help you clean up, I assume.
A. No.
Q. And Jordie Chandler, describe his behavior for us during the time that he was there.
A. He was rude.
Q. In what way?
A. Very demanding.
Q. In what way demanding?
A. Like if I was in the laundry room washing clothes, he'd come and say, "Where's my shirt?" You know, "I want my shirt." Just not nice to where you ask, "Do you have my shirt?" Just kind of "Give it to me now," like that.
Q. Was his behavior like that fairly consistently during the entire time that you were exposed to him?
A. Yes.
Q. Brett Barnes, how did he behave?
A. That little boy, I -- he was not a rude 5319

1 little boy. He was pretty well-behaved.
2 Q. The entire time?
3 A. Yes.
4 Q. Wade Robeson, how did he behave?
5 A. He was kind of wild, too. Not as much as
6 Macaulay. Just wild, tear everything up. Leave
7 messes all over, you know. Just --
8 Q. Were you ever encouraged to discipline these
9 kids in any way?
10 A. No.
11 Q. Were you discouraged from doing so?
12 A. Yes.
13 Q. In what way?
14 A. Well, I was told by Norma Stakos that --
15 MR. MESEREAU: Objection; hearsay.
16 MR. ZONEN: Her state of mind to explain her
17 behavior.
18 THE COURT: Sustained.
19 Q. BY MR. ZONEN: Did you ever go up to any
20 child and say, “Don’t do that. That’s
21 inappropriate”?
22 A. No.
23 Q. Did you ever see any employee or hear of any
24 employee go up to a child and say, “Don’t do that.
25 That’s inappropriate”?
26 A. No.
27 Q. Other than Brett Barnes, was the behavior of
28 the three children that you described consistently 5320

bad the entire time they were there?
A. Yes.
Q. Did that include times when they were in the presence of Michael Jackson?
A. Yes.
Q. Did you ever hear Michael Jackson discipline them in any way or tell them not to behave in such a destructive fashion?
A. No.
Q. Did you tell anybody about the events that you saw, the three incidents that you testified to involving those three children, Brett Barnes, Macaulay Culkin and Jordie Chandler?
A. Yes.
Q. Who was the first person you discussed that with?
A. Lawyers I had. Lawyers.
Q. The lawyer who was representing you?
A. Yes.
Q. Which lawyer was that?
A. Michael Ring.
Q. Had you told anybody about those events prior to that?
A. I believe I talked to Kiki Fournier. I didn't even know -- I think it might have been after I -- it might have been after I had left.
Q. Now, you worked there, I believe you said, about four years; is that correct? 5321

A. Yes.
Q. All right. Why did you leave there?
MR. MESEREAU: Objection; relevance.
THE COURT: Overruled.
You may answer.
THE WITNESS: When Mr. Jackson had that
Jordie Chandler molestation case, whatever,
bodyguards were brought -- brought to the ranch.
They weren't the regular security people. These
people were called OSS, Office of Special Services.
And there were a lot of these guys, and they started
harassing --
MR. MESEREAU: Objection. Narrative;
nonresponsive.
THE COURT: Sustained.
Q. BY MR. ZONEN: Well, "OSS" stands for Office
of what?
A. Of Special Services.
Q. All right. Who were these people? Do you
know their names?
A. There was one, Jimmy Van Norman. Tony
Coleman. Marcus Johnson. Jerome Johnson.
Q. Were these people armed with weapons?
A. Yes. Yes.
Q. And they came to the ranch after the
commencement of the Jordan Chandler investigation?
A. Yes.
Q. Did you know when the Jordan Chandler 5322

investigation began?
A. Yes.
Q. Was there a search that was conducted at
Neverland by Los Angeles Police Department?
A. Yes.
Q. Were you present at the time that happened?
A. I -- yes, but I -- yes, but I had called in
sick that day and I had to go back to the ranch.
Q. You had called in sick that day?
A. I was sick on that day.
Q. By coincidence, or you knew there was going
to be a search?
A. No, I didn't know. I did not know. I just
was sick and I called in sick.
Q. And had anybody heard of anything in advance
of that search?
A. No.
Q. There had been no talk about that at all?
A. No.
Q. Fair to say there was probably considerable
talk thereafter?
A. Yes.
Q. Were you interviewed by anybody from law
enforcement during this investigation?
A. Um --
Q. I think the question that I asked was, had
you been interviewed by anybody from law enforcement
during the course of that investigation? 5323

A. I believe so.
Q. All right. Did you become aware of the fact that there had been a lawsuit filed on behalf of Jordan Chandler?
A. Yes.
Q. Were you called to testify in a deposition?
A. Yes.
Q. And did you, in fact, give a deposition to attorneys representing both Mr. Jackson and Mr. Chandler?
A. Yes.
Q. Do you remember who those attorneys were?
A. Larry Feldman, Howard Weitzman, and some lady named, I think, Jan Faye or --
Q. Were you still employed at Neverland during that time?
A. Yes.
Q. During the course of that deposition, were you asked if you observed any behavior by Michael Jackson directed toward Jordie Chandler or anybody else that you thought was inappropriate or any form of sexual behavior?
A. Yes.
Q. How did you answer that question?
A. I didn’t tell the truth.
Q. What did you say?
A. I said I didn’t see anything.
Q. All right. Why did you say that in this 5324

1 deposition?
2 A. Because when -- when I had taken over the
3 job for Mr. Jackson's room, Mr. Jackson had
4 threatened me.
5 Q. What did he say to you?
6 A. He had told me, "You know, Adrian, if you
7 ever say or you do something that I don't like, all
8 I have to do is tell Bill Bray or Norma Stakos, and
9 they will take care of you, but it wouldn't come
10 from me. "
11 Q. Were you concerned about that statement?
12 A. I was very concerned with that.
13 Q. That was what, three years earlier?
14 A. That was right when I took the bedroom.
15 Q. Why did you continue to work there after
16 that statement?
17 A. I don't know. I -- I got caught up, I
18 guess, in -- my husband was laid off, and we had a
19 house payment, and I just stayed.
20 Q. What was your salary at Neverland?
21 A. I worked 40 hours a week, but I started at
22 7.50 an hour.
23 Q. What was your salary at the time that you
24 left Neverland?
25 A. I left at 8.86 an hour.
26 Q. In the four years, your salary went up $1.80
27 an hour?
28 A. Yes. 5325

Q. What hours did you maintain at Neverland?
What was your schedule?
A. Sometimes 8:30 to 5:00. Sometimes 8:30 till
one o’clock in the morning. You never knew, kind
of, when you were going to go home.
Q. Every day you went to Neverland, you didn’t
know if you would go home at 5:00?
A. Right.
Q. How often was it that you were asked to stay
after 5:00?
A. There were a lot of times.
Q. In a week period, how many days in that week
would you expect to stay after 5:00?
A. You just never knew. It depended if there
were guests. Sometimes it could have been two
times. Three times. You just didn’t know when you
were going to go home.
Q. And you could stay actually until the early
morning?
A. Yes.
Q. And then come back the next day at 9:00?
A. Yes.
Q. Were you ever asked to work weekends?
A. Yes.
Q. If you were asked to work on an evening or
on a weekend, and you didn’t want to, would you just
simply say, “I can’t do that tonight”?
A. No.

Q. Why?
A. Because you were scheduled and you had to show up.
Q. Now, you started talking about OCC -- OSS. A little dyslexia here, excuse me. OSS. And you named the people who were involved in OSS; is that right?
A. Yes.
Q. Up until that time, had there been people armed at Neverland?
A. No.
Q. Were each of those people armed with weapons?
A. I believe so.
Q. How was their behavior toward you?
A. They were terrible.
Q. How did they behave toward you? What did they do?
A. Jimmy Van Norman would --
MR. MESEREAU: Objection; vague as to time and individuals.
Q. BY MR. ZONEN: Let's begin with Jimmy, then. I'll withdraw the question. Ask you specifically about Jimmy Van Norman. All right. And from the time that he came on working until the time you quit was approximately how many months?
A. I would say maybe six or seven months, 5327

maybe.
Q. During that time, was his behavior toward you fairly consistent?
A. Yes.
Q. And describe things he would do to you, or with you.
A. He called my home one morning when I was still kind of asleep, and he woke me up with a phone call. And I was going to take my son to school that day. It was a Monday, I remember. And he said, “Adrian” --
MR. MESEREAU: Objection; hearsay.
MR. ZONEN: Goes to her state of mind and explaining her conduct.
THE COURT: The state of mind being why she left?
MR. ZONEN: And commenced a lawsuit.
THE COURT: All right. I’ll overrule the objection.
Q. BY MR. ZONEN: All right. What happened in this call?
A. He called my home early in the morning, and he said, “Adrian?” And I said, “Yes?” And he says, “You sound different.” And I said, “Well, I just woke up” You know, I hadn’t had coffee. My voice was a little bit rough.
And he says something about what kind of underwear I wear, and when was the last time I got 5328

1 “it”; that apparently I needed it.
2 Q. Did you recognize the voice when he called?
3 A. Yes, I did.
4 Q. Did he have to identify himself?
5 A. No, he didn’t. But I knew it was him.
6 Q. What did you do when you said that?
7 A. I changed the subject, because I thought
8 maybe Mr. Jackson needed something and maybe he was
9 just calling to -- to get Mr. Jackson to talk to me
10 or something. I didn’t know.
11 Q. Did he ultimately communicate a message to
12 you from Mr. Jackson?
13 A. Sometimes -- not him, but sometimes the
14 other ones would.
15 Q. But on that occasion, that particular call,
16 did he ultimately communicate a communication from
17 Mr. Jackson?
18 A. No, he didn’t.
19 Q. Did he ever tell you why he was calling?
20 A. No.
21 Q. Okay. Did you hang up that phone call?
22 A. Actually, he got another call, and the phone
23 was ringing in the back, which I knew was a Merlin
24 phone, because I knew the sounds of the phones, and
25 he said, “Darn, I’ll call you right back.”
26 Q. Did he call you right back?
27 A. He didn’t call back.
28 Q. Had you received more than that one phone 5329

call from this person, Van Norman?
A. I did receive another call later, and I --
and I don't know the month. Right now I can't think
of the month. And it was Jimmy, and he --
MR. MESEREAU: Objection; hearsay.
MR. ZONEN: Same reason.
THE COURT: Well, you know, I'm not getting
to her state of mind either. All of that testimony
I let in for her state of mind I let in at your
request for her state of mind.
MR. ZONEN: Let me withdraw the last
question and let me move on.
THE COURT: I need an offer as to why I've
let other testimony in.
MR. ZONEN: Let me withdraw that question
right now and move on.
Q. Did you quit your job at Neverland?
A. Yes, I did quit.
Q. Why did you quit?
A. Because I was being sexually harassed. I
had death threats. I was being chased in the house
with a stun gun. More like abuse. And mentally I
could not deal with it.
Q. Was this all the new collection of guards
that had been brought in?
A. Yes.
Q. Did you ever talk with Mr. Jackson about
what was going on? 5330

A. I don’t believe so, with that.
Q. And why not?
A. I believe he left. He had left later, maybe in February. And Marcus Johnson left with him with the bodyguards, but there was still bodyguards around, so Mr. Jackson wasn’t really around where you could tell him, so --
Q. What made you decide to file a lawsuit against Mr. Jackson?
A. When I realized that I didn’t have to work in a job where I was being sexually harassed, and abused, and having to deal with death threats and --
Q. Did you talk with Mr. -- who was your attorney? Who represented you?
A. Actually, we had Michael Gray and Michael Barber, and we had Michael Ring and Kelly Frances.
Q. All from the same firm?
A. At the time, yes.
Q. Who was the lead attorney in that case?
A. Michael Barber. And Michael Ring (sic) ended up, I guess, getting out of it. I don’t know what happened there, but Michael Ring ended up taking over.
Q. Michael Ring?
A. Michael Ring.
Q. Was he the one who tried the case?
A. Yes.
Q. That case went on for quite some number of 5331

1 months, didn't it?
2 A. Yes, it did.
3 Q. Did you quit your job before or after
4 seeking counsel from Michael Ring or any other
5 lawyer?
6 A. I believe I quit my job first while I went
7 out on doctor's care.
8 Q. You were not the only plaintiff in that
9 suit, were you?
10 A. No.
11 Q. Who were the other plaintiffs?
12 A. There was Melanie Bagnall, Kassim Abdool,
13 Sandie Domz, and Ralph Chacon.
14 Q. Was there a counterclaim that was filed
15 against you? Were you accused of anything?
16 A. Yes.
17 Q. What were you accused of?
18 A. I believe of -- of, I think, taking Super
19 Soaker water guns. Taking candy, balloons, posters,
20 sunglasses.
21 Q. Were you accused of taking a drawing?
22 A. Yes.
23 Q. All right. Tell us about the drawing.
24 A. The drawing, actually, I had found it in the
25 trash outside by the rec room. It was a trash area
26 there. And I had taken trash out from the house,
27 from the kitchen, and I saw it in there. There was
28 a bag out there, and it was just open and it was a 5332

sketch. It wasn't a big sketch. It was a small sketch.
Q. About how big?
A. Oh, gosh. Probably -- I don't even know. Maybe about that big. Maybe like that. It wasn't very big.
Q. Six inches by five inches --
A. Yeah.
Q. -- something like that?
MR. MESEREAU: Objection; leading.
THE WITNESS: Yeah, something like that.
THE COURT: Sustained.
Q. BY MR. ZONEN: Can you give us an estimate on the record, the size of it? Because you were holding your hands out.
A. Maybe three-by-five. I don't know. Something like that.
Q. All right. You said you found it in the trash?
A. Yes.
Q. Where?
A. Outside. Outside by the rec room. There was a trash area back there.
Q. Did you know who did the drawing?
A. I didn't know who did it, but I thought -- well, maybe. I was really -- I don't know who did it.
Q. Who did you believe did it? 5333

A. Um --
MR. MESEREAU: Objection; calls for speculation.
MR. ZONEN: Explains why she took it.
THE COURT: Actually, you know, we're having the same problem that when Mr. Mesereau was asking questions. You seem to be going into the allegations in the Complaint, which -- the facts of the lawsuit, which I've said we can't do. So I'm going to ask you to go into a different area.
MR. ZONEN: All right.
Q. After many months in trial, was there a resolution to that case?
A. Yes.
Q. What happened?
A. We lost.
Q. Each of you?
A. Yes.
Q. As to all counts?
A. Yes.
Q. Was there a judgment against you?
A. Yes.
Q. For a great deal of money?
A. Yes.
Q. How much?
A. 1.6 million.
Q. Did you go into bankruptcy afterward?
A. No.

Q. So that debt still exists today?
A. Yes.
Q. You owe Mr. Jackson $1.6 million?
A. Yes.
Q. Is that for all the attorney's fees and the court costs?
A. Yes.
Q. Have you paid any part of that?
A. A lien was put on my paycheck when I was working at Sears and there was money taken out, but I don't recall how much.
Q. Okay. Is there a lien currently on your paycheck where you currently work?
A. For the lawsuit?
Q. For this lawsuit.
A. No.
Q. Do you anticipate that will happen?
A. I don't --
MR. MESEREAU: Objection. Calls for speculation; relevance.
THE COURT: Sustained.
Q. BY MR. ZONEN: Are you concerned that that will happen?
MR. MESEREAU: Same objection.
THE COURT: Sustained.
Q. BY MR. ZONEN: Had there been a deposition that was taken of you prior to the commencement of that lawsuit? 5335

A. Do you mean like before, with Jordie Chandler?
Q. Yes.
A. Yes.
Q. In the course of that deposition, did you disclose the events that took place that you've disclosed to this jury?
A. No, I did not.
Q. Are you talking about the Jordie Chandler lawsuit, deposition?
A. Yes.
Q. Was there a subsequent -- another deposition that was done in the lawsuit of your case, Kassim Abdool and everyone else against Michael Jackson and everyone else?
A. Yes.
Q. In that deposition, did you disclose what you saw?
A. Yes, I did.
Q. At some point during the course of that lawsuit, either before the commencement of trial or during, were you involved with others in selling a story to a tabloid?
A. Yes.
Q. Which tabloid was it?
A. Actually, there was a man named Gary Morgan, and he was from Splash.
Q. What is Splash? 5336

A. I don’t know -- I don’t know if he’s affiliated with different -- I’m not even really sure. I just know that he sold stuff.
Q. But it was a tabloid?
A. I believe so.
Q. Did you actually have an interview with them?
A. Yes.
Q. Did they give you money?
A. Me personally?
Q. Yes.
A. They were -- well, can I explain, because I don’t --
Q. Who did the interview? In other words, how many of the plaintiffs involved that you’ve identified did this interview?
A. Everybody was there, including our attorney.
Q. Did he participate in the interview as well, your attorney?
A. He was there with -- yeah.
Q. Who is it who negotiated what would be paid?
A. I believe Michael Ring.
Q. Did you have any say in that at all?
A. No, I didn’t.
Q. Was it understood that some of the money would be going to you, or all of the money?
A. From what I recall, all of the money went into a trust in Michael Ring’s name in order to 5337

fight the lawsuit against Mr. Jackson.
Q. Did any of that money actually go to you?
A. At one time, yes.
Q. And how much was that?
A. A thousand dollars.
Q. Do you know how much money in total was turned over to Michael Ring?
A. I would honestly -- I mean, my best recollection, I'd say probably maybe 32,000 or more.
Q. And did that go to finance the lawsuit?
A. Yes.
Q. Were you involved in another lawsuit at that time or prior to that time?
A. Yes.
Q. What was that?
A. Well, it had to do with my husband's sister-in-law.
Q. And what happened?
A. My husband was -- my husband had two half brothers. They had different fathers. And one of the half brothers was real close with my husband, and he ended up diabetic and he lost his eyes and his kidneys and they had him on dialysis. He went blind.
And he was married, and his wife and him, I guess they had a very -- a relationship that wasn't very good. From what I understand, she started fooling around with a radio talk show guy, and she 5338

1 got pregnant --
2 Q. Tell us what happened with regard to the
3 lawsuit.
4 A. I'm sorry.
5 Q. Who was suing who?
6 THE COURT: How many lawsuits are we going to
7 cover?
8 (Laughter.)
9 THE WITNESS: I'm sorry.
10 We got sued.
11 Q. BY MR. ZONEN: Okay. For what? The
12 resolution of his estate?
13 A. Actually, my husband was left as a
14 beneficiary, and my husband got kind of fed up with
15 her. And that was a family thing on their side of
16 the family. And I kind of just got drug into it,
17 but --
18 Q. Did you have counsel representing you in
19 this lawsuit?
20 A. No, we didn't.
21 Q. Was it a jury trial?
22 A. No.
23 Q. Was it a court trial?
24 A. Yes.
25 Q. You were representing yourself?
26 A. Yes.
27 Q. Was the other side represented by counsel?
28 A. Yes. 5339

Q. Was there a judgment entered against you or your husband?
A. I believe 17,000 from each one of us.
Q. Was this from money from the estate?
A. Yes.
Q. Did you pay that?
A. I made payments, and I don't even recall how much I made payments for. And then I couldn't do it no longer.
Q. All right. Did you lose your home in this process?
A. No. We sold our home.
Q. And are renting today?
A. Yes.
Q. Do you know anybody in the Arvizo family? Do you know that name?
A. No.
Q. Do you know a Janet Arvizo?
A. No.
Q. Gavin Arvizo?
A. No.
Q. Star Arvizo?
A. No.
Q. Davellin Arvizo?
A. No.
Q. I had asked you earlier about a drawing. Was that drawing sold to someone during the course of your litigation? 5340

A. Yes.
Q. And who was it sold to?
A. Well, actually, at Michael Ring's office, our attorney, Gary Morgan had asked if we had any photographs or pictures or something, and I said, "Well," you know, "there's a sketch that I found, I found in the trash." I told him, "You can have it." It was just a sketch. It wasn't a -- it wasn't a Polaroid, you know, it was just ink. And I gave it to him. And I guess he went and sold it.
Q. Who sold it?
A. Gary Morgan.
Q. And Gary Morgan is who?
A. He's from Splash.
Q. Did you get any money for that?
A. Actually, I think that when -- I believe that's where that thousand dollars might have come from.
Q. From the sale of that picture?
A. I think so.
Q. Did you represent that as a drawing that had been done by Michael Jackson?
A. I believe I might have said it, that I thought it was done by Michael Jackson.
Q. Did you believe it was?
A. I did.
Q. Why did you have it in the first place? Why did you take it? 5341

A. Because I found it in the trash and I figured it was in the trash, so if something's in the trash, I mean, somebody might not have wanted it.
Q. Did you take it because you believed he did it or did you take it because you liked it?
A. I took it because I liked it, because I liked to draw and I thought it was pretty neat.
Q. I'd like to show you a few exhibits, if I may.
Counsel, you've seen these.
MR. MESEREAU: Yeah.
Q. BY MR. ZONEN: I'd like to show you Exhibit 797 and 798. What are those two exhibits, 797 and 798?
A. They're -- they're -- it's an exhibit of a note that Mr. Jackson had given me on an index card, along with $300.
Q. Okay. Those are the two exhibits. One is the note and the other is what?
A. The $300.
Q. It's not actually $300 you have in front of you, is it?
A. Half.
Q. Well, it's a Xerox or a photocopy; is that right?
A. Right, a Xerox copy.
Q. Explain what that is. Where did that money 5342

come from?
A. Well, I have to tell a story in order for
that to --
Q. Let me ask you a question and see if I can
lead you in that direction. Who gave you the $300?
A. Mr. Jackson.
Q. When did he give you that $300?
A. After he had read my transcript from the
Jordie Chandler deposition.
Q. All right. How did he happen to have your
transcript from the Jordie Chandler deposition?
MR. MESEREAU: Objection; foundation.
THE COURT: Sustained.
Q. BY MR. ZONEN: Did you give him that
transcript?
A. Yes, because he called me at home and asked
me --
MR. MESEREAU: Objection. Nonresponsive;
move to strike.
THE COURT: I'll strike after, "Yes."
Q. BY MR. ZONEN: All right. Did you have a
conversation with Mr. Jackson about your testimony
during the Jordie Chandler deposition?
A. Yes, I did.
Q. And that was the deposition you previously
told us wherein you denied that anything had
happened that you had seen; is that correct?
A. That's correct. 5343

Q. All right. In the course of that
conversation with Mr. Jackson, did he ask you if you
had a copy of that transcript?
A. Yes, he did.
Q. Did he ask to see it?
A. Yes, he did.
Q. Did you give it to him?
A. Yes. Yes, I did.
Q. When did you give it to him? How long after
that telephone conversation was it that you gave it
to him?
A. I believe it might have been the next day.
Q. And how did you happen to have a copy of the
transcript?
A. I had gotten it earlier than usual, than the
usual wait for a transcript, and I believe I -- I
believe I had called Jan, I think her name was Jan
Faye, and then they had sent it to me, but I got it
earlier than you would wait for a deposition.
Q. Had you already read that transcript before
you gave it to Mr. Jackson?
A. Maybe parts of it.
Q. What was your next conversation with Mr.
Jackson?
A. Are you talking about, like, on the phone
or --
Q. Well, did you have a follow-up conversation
about that transcript? 5344

A. Yeah. He told me that he had read it.
Q. Did he give it back to you, the transcript?
A. Actually, I got it back. I told him I was going to take it.
Q. Did he give you anything?
A. Yes, he did.
Q. What did he give you?
A. The $300 and the little note.
Q. And the note says what?
A. It said, “Adrian, thanx for everything.”
Q. And the $300 were in what denominations?
A. In 100-dollar bills.
Q. Did you see anything unique about the hundred-dollar bills?
A. Yes, I did.
Q. What was that?
A. The serial numbers were all, like, in sequence, which was really neat, because I had never seen anything like that, and I thought that was really neat.
Q. How did you happen to have a Xerox copy of them or a photocopy?
A. Because -- I thought it was so neat that I photocopied it, because I had never seen anything like that, you know, the sequence of bills like that.
Q. Did you keep the money?
A. Actually, when -- when he gave it to me, I 5345

called him up at the theater, he was in the theater, and I told him I didn't want the money. And he asked me why. And I said, "I just" -- "I don't want the money."
Q. He didn't give you the money in person?
A. He gave me the money, but it was in an index card and it was folded.
Q. Okay.
A. And he told me to read it, to open it. It was in his bedroom. He handed it to me in his room. And I didn't open it right away, because I was cleaning.
And he kept saying, "Open it, open it, open it." And I opened it after he left the room, and I saw the $300 and the note was all attached.
Q. And then you called him?
A. And I called them. He went to the theater and I called him.
Q. All right. What did you say to him?
A. And I told him, "I can't take that money." And he said, "Why?" And I said, "I just can't take it." And he said -- he kept asking, "Why?" And then he said, "Well, then give it to your son."
Q. Did you do so?
A. I ended up giving my son some of the money, yeah.
Q. Did you keep the balance of it?
A. I kept some money. I don't even recall how 5346

much.
Q. The Xeroxes that you're looking at, the one of the note itself, does that accurately reproduce the note?
A. Yes.
Q. All right. Now, the other one that shows the three hundred-dollar bills, can you tell us why it only shows half of the $100 bills?
A. I don't understand the question.
Q. Well, as you look at that exhibit, do you see that only half of each $100 bill is depicted in that Xerox or that photocopy? Am I right?
A. Yeah, you're right.
Q. And tell me why that is. Tell me why the Xerox doesn't show the entire $100 bill.
MR. MESEREAU: Objection; foundation.
MR. ZONEN: Withdraw that question.
Q. Do you know why that is? When you -- go ahead.
A. Actually, when I photocopied, I photocopied both sides, you know, like the front side of the bills and then the back side of the bill. But in what I turned over in my deposition, the whole bills were there. I don't know why it's just half.
Q. You've never seen that before?
A. I've never seen this before.
Q. All right. To the extent that those are three $100 bills with consecutive numbers, do they 5347

appear to be the same $100 bills?
A. Yes.
Q. And they are, in fact, $100 bills with consecutive numbers; is that correct?
A. Yes.
MR. ZONEN: I move to introduce both of those exhibits into evidence.
MR. MESEREAU: I'll object; no foundation. She did not recognize the document.
THE COURT: I'll admit the documents.
MR. ZONEN: Thank you.
Q. I'd like to show you some additional photographs, if I may.
MR. MESEREAU: Could I see those?
Q. BY MR. ZONEN: Showing you a photograph previously identified as 793, do you recognize the person in that photograph?
A. Kind of looks like Brett Barnes, but I'm not sure.
Q. Do you believe that might be Brett Barnes?
A. Kinda, yeah.
Q. Let me show you the photograph in 795. Let's start with 794. Two different photographs. The first with the child on the top, and the second with a number of children on the bottom. Start with the photograph with the child on the top. Do you know who that is?
A. That's Brett Barnes. 5348

Q. And then the photograph on the bottom, do recognize any of the four people?
A. I can't -- no. I can't tell if that's Brett. He was little. I just --
THE REPORTER: I'm sorry, I can't hear you.
Q. BY MR. ZONEN: Speak into the microphone.
A. The first photo I believe is Brett Barnes. The second one I can't really tell.
Q. Let me show you Exhibit 795. Do you recognize anybody in that photograph?
A. Brett Barnes.
Q. And where is Brett Barnes in that photo?
A. Right here.
Q. All right. Who is he sitting next to in that photograph?
A. Mr. Jackson.
Q. Do you know the other people in that photograph?
A. I think it's Carly in the middle. They look different, though, from when I seen them.
Q. Carly is the middle person?
A. Yeah, the sister of Brett.
Q. And the mother to her on the right side of her?
A. Right.
THE COURT: We're going to break a little early. Take our afternoon break.
(Recess taken.) 5349

THE COURT: Go ahead.
MR. ZONEN: I have just a couple more questions.
Q. Is there a wine cellar at Neverland?
A. Yes.
Q. And where is the wine cellar?
A. It's in the rec room, the recreation room.
Q. All right. Is that sometimes called the arcade?
A. Yes.
Q. That's the building that's different from the residence?
A. Yes.
Q. Is there a door that secures the wine cellar?
A. Yes.
Q. Is that door kept locked, or was it kept locked during the time that you worked there?
A. It was always locked.
Q. Was it a key that opened that door or a combination lock?
A. It was a key.
Q. And do you know where the key was kept?
A. In the maids' room.
Q. And where was the maids' room?
A. In the main house.
Q. In the main house?
A. Yes. 5350

Q. Was there more than one key to the door?
A. I believe there was.
Q. Did you ever have occasion to go down into the wine cellar?
A. Yes.
Q. For what reason?
A. To pick it up, clean. Just to make sure everything was cleaned up in there.
Q. And to do that, you have to first go get the key?
A. Right.
Q. All right. The room where the key was kept at that time, was that a room that was open to anybody in the public?
A. Well, it was the maids' room. The maids were usually in there. I mean, somebody could walk in there.
Q. But it wasn't a room that was generally one of the rooms on tour when people took a tour of Neverland?
A. No.
Q. Was it a room that somebody lived in or simply worked in? You said maids' room. What is the maids' room?
A. The maids' room is just like where the maids would go to take a break. It had a rest room and --
Q. Do you know if there were any other keys at that time? 5351

A. I believe so.
Q. And do you know who else had those keys?
A. I believe security at that time had -- in
their office, they had a key to that.
Q. You would pick up in the wine cellar on
occasion?
A. Yes.
Q. What would require cleaning in the wine
cellar? What do you mean by “pick up”?
A. Like, to go in there and to make sure that
everything is -- sometimes you would have to brass.
There was a lot of brass out there, so we’d have to
brass, like, the sinks. So they had -- the faucets
were of brass.
Q. All right. Cleaning is what you mean?
A. Just cleaning, yeah.
Q. I’m going to show you two photographs
already shown to counsel. These two photographs are
No. 786 already in evidence, and No. 799 for
identification, not yet in evidence.
No. 786, first of all, take a look at this
photograph and tell us what that is.
A. That’s Mr. Jackson’s bedroom where the
Jacuzzi is.
Q. Is that the Jacuzzi that you were referring
to when you were describing having to clean that
Jacuzzi?
A. Yes. 5352

Q. 799, tell us what this photograph is.
A. This is the theater.
Q. Now, can you actually see windows up on that far wall on the theater?
A. Actually, you have the projection room right here, and there was a window right here, a room, a bedroom. There was two bedrooms. There was one on this side, and there was one I believe on the other side.
And there was an area where you go up some stairs on the side and would take you up, up high where you'd be like in a viewing room. And the viewing room would have -- I'm trying to think if that's it up there.
Q. You're pointing right now to what?
A. I believe that is probably the viewing room up above. It was up above the bedrooms.
Q. You were previously describing testimony of popcorn and Coke being thrown through windows above --
A. Right.
Q. -- in the theater.
A. Right.
Q. Are those windows shown in that particular photograph?
A. I believe it's up here.
Q. All right. Now, that photograph that you're looking at - which I believe I said was 799 - 799, 5353

1 is the subject matter of that photograph accurately
2 depicted in the photograph? In other words, does it
3 accurately portray what's inside?
4 A. I believe so, yes.
5 MR. ZONEN: I'd move to introduce 799 into
6 evidence.
7 MR. MESEREAU: No objection.
8 THE COURT: It's admitted.
9 MR. ZONEN: If I could publish 799 at this
10 time.
11 Q. If you could, turn around and look at the
12 screen behind you. And tell us, is that the
13 photograph that you just viewed, 799?
14 A. Yes, I believe so.
15 Q. Is that the theater?
16 A. Yes.
17 Q. All right. Now, on the desk in front of
18 you, there's a laser pen, a laser pointer. If you
19 can do that -- that's not it. That's it.
20 A. Okay.
21 Q. Don't --
22 A. Okay.
23 Q. Show us the windows that you were referring
24 to.
25 A. The window from up above?
26 Q. Yes.
27 A. It would be up here.
28 Q. And that's the -- a viewing room? 5354

A. I believe it was a viewing room, yes.
Q. And the stairway to get up there is where?
A. I believe it's on -- it used to be kind of like on the side as you're coming in the back out here. There was a stairway. It's been so long. I know there was a stairway on the side, and I'm thinking somewhere back here, that would take you up to the top.
BAILIFF CORTEZ: Ma'am, you need to talk into that microphone.
THE WITNESS: I'm sorry.
Q. BY MR. ZONEN: So you believe the stairway was on the side; is that what you said?
A. I believe it was on the side.
MR. ZONEN: Thank you. No further questions.
THE COURT: Cross-examine?
MR. MESEREAU: Yes, please. Your Honor.

CROSS-EXAMINATION
BY MR. MESEREAU:
Q. Good afternoon, Miss McManus.
A. Good afternoon.
Q. We haven't met. My name is Tom Mesereau and I speak for Michael Jackson.
A. Okay.
Q. The prosecutor for the government mentioned a case you were involved in where you were sued by 5355

Rosalie Hill, correct?
A. Correct.
Q. You were sued by Rosalie Hill as the guardian ad litem for two children, correct?
A. Correct.
Q. The children were Shane McManus and Megan McManus, correct?
A. Correct.
Q. And the prosecutor for the government mentioned that you didn't have a lawyer representing you, right?
A. Correct.
Q. And that case was not tried before a jury, right?
A. Right.
Q. It was tried before a judge of the Santa Barbara Superior Court, correct?
A. I believe so.
Q. That was Judge Richard A. St. John, Judge of the Santa Barbara Superior Court, true?
A. I believe so.
Q. And you and your husband testified before Judge St. John, right?
A. I believe so.
Q. You told them your position under oath, correct?
A. I believe so.
Q. And after you told Judge St. John your 5356

position under oath, he found that you and your husband willfully and maliciously defrauded these children out of the money in the estate, true?
A. I believe so.
Q. Judge St. John found that that money was to be held in trust for the benefit of those two children, right?
A. Yes.
Q. He found that you and your husband dissipated those funds, right?
A. I believe so.
Q. He found that you and your husband violated that trust, right?
A. I believe so.
Q. He entered a judgment against you and your husband for $30,000 -- excuse me, 30,584.89, correct?
A. I believe so, but I believe it was -- I thought it was like separate, like -- I thought it was maybe 17 for me and 17 for my husband. Maybe -- I don't know. Maybe that's right, what you have there.
Q. Would it refresh your recollection if I just show you Judge St. John's judgment?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay. 5357

Q. BY MR. MESEREAU: Have you had a chance to look at that judgment?
A. Right here? Yes.
Q. Does it refresh your recollection about the amount Judge St. John awarded the plaintiffs against you and your husband?
A. Yes.
Q. Okay. It was $30,584.89, which was principal and interest due, correct?
A. I believe so.
Q. And after he entered that judgment, Judge St. John also awarded the plaintiffs attorney's fees, right?
A. I believe so.
Q. He signed a separate judgment awarding the people who sued you and your husband $5,085.27 in attorney's fees and costs, right?
A. I believe so.
Q. And in that judgment, Judge St. John also found, again, that you and your husband had willfully and maliciously stolen the money from those children, right?
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: All right. Now, that lawsuit was before you sued Michael Jackson, correct?
A. I believe so. 5358

Q. And who did you join with in your suit
against Michael Jackson?
A. Kassim Abdool -- do you want the names?
Q. Yes, please.
A. Kassim Abdool, Ralph Chacon, Melanie Bagnall
and Sandie Domz.
Q. And in that case you had a lawyer, right?
A. Yes.
Q. In fact, you had a number of lawyers, right?
A. Correct.
Q. And you've already identified the lawyers
that represented you and the other people that sued
Michael Jackson with you, correct?
A. Correct.
Q. Now, that case went to a jury, right?
A. Yes.
Q. That was a jury in this courthouse in Santa
Maria, right?
A. Yes.
Q. In that particular case, a Santa Maria jury
held that you had stolen from Michael Jackson,
right?
A. I believe so.
Q. And they awarded Mr. Jackson $35,000 for
what you personally had stolen from him, right?
A. The sketch that I found in the trash, yes.
Q. That was a sketch he had done of Elvis
Presley, right? 5359

A. Well, I thought it looked like Elvis
Presley, but I don't really know for --
Q. But you tried to sell it to a tabloid,
correct?
A. Yes.
Q. You did sell it to a tabloid, correct?
A. Well, I gave it to Gary Morgan.
Q. You sold it to a tabloid, right?
A. I believe he did.
Q. You don't know for sure?
A. I don't know who he actually really sold it
to, but --
Q. You certainly inquired at some point,
correct?
A. I think I saw somewhere later that it was
printed, but I don't remember like what, but it was
printed.
Q. But when you sold it, you believed it was a
sketch by Michael Jackson of Elvis Presley, right?
A. I thought so.
Q. And a Santa Maria jury held that you had
stolen that from Michael Jackson, right?
A. That's what they thought, yeah.
Q. And that was their verdict, true?
A. I believe so.
Q. Okay. There was a finding that you had
acted with fraud and malice against Michael Jackson
in that case, correct? 5360

A. I believe -- you know, it's been so long, I don't remember, but probably.
Q. You actually stipulated that you had engaged in fraud, oppression, and malicious conduct against Mr. Jackson, true?
A. You know what, I don't remember everything. It's been a while, but --
Q. Would it -- excuse me. Would it refresh your recollection if I show you that judgment?
A. Sure. That's fine.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
MR. ZONEN: May I see, Counsel?
(Off-the-record discussion held at counsel table.)
MR. MESEREAU: Let me withdraw the question and ask it again.
Q. The jury found you had acted with fraud, oppression and malice against Mr. Jackson, true?
A. You know what? Honestly I don't really recall. I don't know.
Q. Would it refresh your recollection if you see the judgment?
A. Well, sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to 5361

read that judgment?
A. Yes.
Q. Does it refresh your recollection about the jury in Santa Maria finding that you had acted with fraud, oppression, and malice against Mr. Jackson?
A. Yes.
Q. That's what they held, right?
A. That's what they -- yeah.
Q. All right. Now, the total amount -- excuse me, let me start again.
The suit began when you and the others sued Mr. Jackson, right?
A. Correct.
Q. And after you and Ralph Chacon and Mr. Abdool and Ms. Bagnall sued Mr. Jackson, he responded with a countersuit, correct?
A. Correct.
Q. And the countersuit was an allegation that you had stolen property from him, right?
A. I believe so.
Q. Okay. Mr. Jackson's suit was a response to your suit, right?
A. Correct.
Q. Everything began when you and Mr. Chacon and Mr. Abdool filed the action, right?
A. Correct.
Q. And that's the action where you were represented by Mr. Ring, correct? 5362

A. Correct.
Q. Okay. At the end of the case, there was a judgment signed by Judge Zel Canter of the Superior Court of Santa Barbara in Santa Maria against you and Mr. Chacon and Mr. Abdool and Melanie Bagnall and Sandie Domz for $1,473,117.61, right?
A. I believe it was more. I -- I thought it was 1.6 million each person.
Q. Would it refresh your recollection if I just show you --
A. Sure.
Q. -- this?
May I approach, Your Honor?
THE COURT: Yes.
MR. MESEREAU: Thank you.
THE WITNESS: Okay. All right. Uh-huh.
Q. BY MR. MESEREAU: Have you had a chance to look at that judgment?
A. Yes.
Q. And does it refresh your recollection about the amount?
A. Yes.
Q. Okay. Now, do you recall that Mr. Jackson was entitled to have a hearing on what are called punitive damages after he won the jury verdict, right?
A. I believe so.
Q. And Mr. Jackson agreed to waive that portion 5363

of the trial, correct?
A. I believe so.
Q. He did it in return for one dollar, right?
A. Correct.
Q. Now, the prosecutor asked you some questions about a deposition that you appeared at in the Jordie Chandler lawsuit, right?
A. Correct.
Q. And I believe you told the jury that you had lied under oath in that lawsuit, correct?
A. Can you repeat that? I'm sorry.
Q. Yes, sure. I believe you told the jury that you lied under oath in that lawsuit, correct?
A. What jury? During our trial?
Q. No, let me start the question again. If you don't understand anything I ask you, don't answer, just ask me. I'll try and rephrase.
A. Okay.
Q. In response to the prosecutor's questions, you told the jury that you had appeared at a sworn deposition in the Jordie Chandler lawsuit, right?
A. Correct.
Q. That was a lawsuit that you knew Mr. Chandler's parents had filed against Mr. Jackson, right?
A. Correct.
Q. And you appeared and testified under oath in a deposition, right? 5364

A. Correct.
Q. And you were asked questions by a number of lawyers, including Larry Feldman, right?
A. Correct.
Q. That deposition took place on December 7th, 1993, right?
A. Yes. Correct.
Q. When have you last reviewed that deposition?
A. Actually, I never really went through it to really review it.
Q. I'm sorry?
A. I never really went through it to review it.
Q. Okay. Before I ask you some questions about that deposition, when did you last talk to any prosecutor about your testimony in this trial?
A. Last night.
Q. And who did you talk to about your testimony in this trial from the prosecution side?
A. Ron Zonen.
Q. That's Prosecutor Zonen, who just asked you some questions?
A. Yes.
Q. Okay. Did he talk to you about what you were going to be asked today?
A. No.
Q. Was it a phone call or a meeting?
A. A meeting.
Q. Where did the meeting take place with 5365

Prosecutor Zonen?
A. In Santa Maria.
Q. And how long did the meeting last?
A. A little over three hours.
Q. Did Prosecutor Zonen give you anything to review before you testified today?
A. No.
Q. Did you review any documents to prepare for your testimony today?
A. Well, I -- I have my deposition from when I sued Mr. Jackson, and I did go over that.
Q. Now, that's the deposition from your suit against Mr. Jackson, right?
A. Right.
Q. That's not the deposition that you gave in the Chandler lawsuit, right?
A. Correct.
Q. Now, did you review the deposition you gave in your suit against Mr. Jackson to prepare for your testimony today?
A. Yes.
Q. But you didn't review your deposition in the Chandler case to prepare for your testimony today?
A. Correct.
Q. Did Prosecutor Zonen ask you to review that deposition in your suit against Mr. Jackson to prepare for your testimony today?
A. No. 5366

1 Q. Did he ask you to review any documents
2 before you testified?
3 A. No.
4 Q. You spent three hours with him last night?
5 A. Yes.
6 Q. Did that take place at the District
7 Attorney's Office here?
8 A. No.
9 Q. Where did it take place?
10 A. Somewhere in Santa Maria, a home.
11 Q. Okay. Was Prosecutor Zonen the only one
12 present, besides yourself?
13 A. No.
14 Q. Who else was there?
15 A. During that meeting?
16 Q. Yes, please.
17 A. Russ Birchim.
18 Q. That's a -- Russ Birchim, a Santa Barbara
19 sheriff?
20 A. I believe so.
21 Q. Was anyone else present?
22 A. Just them in the room.
23 Q. Okay. And during those three hours, they
24 went over what you were going to be asked today,
25 right?
26 A. Well, they went over my depo -- Ron went
27 over my deposition.
28 Q. Did he point to specific pages in your 5367

1 deposition?
2 A. No.
3 Q. Well, your deposition is volume after volume
4 after volume, isn't it?
5 A. Yeah.
6 Q. How many volumes was your deposition in your
7 suit against Mr. Jackson?
8 A. You know what? I'm thinking I was deposed
9 for eight days. That's what I think.
10 Q. Did Prosecutor Zonen bring a copy of that
11 deposition with him to your meeting?
12 A. I think he had one.
13 Q. Okay. Did he appear to have all of the
14 volumes to the deposition with him?
15 A. I really don't know.
16 Q. Okay. But he had specific parts he wanted
17 to talk to you about, right?
18 A. Not really specific parts. Just kind of
19 going through it, you know.
20 Q. Did you go through all those eight days of
21 deposition with Prosecutor Zonen in three hours?
22 A. I don't believe so.
23 Q. Okay. Who chose what portions of the
24 deposition you were going to look at during the
25 three-hour meeting, if you know?
26 A. I have no idea.
27 Q. Okay. Correct me if I'm wrong, Prosecutor
28 Zonen had portions of those deposition volumes he 5368

1 wanted to talk to you about, correct?
2 MR. ZONEN: Objection as to what he wanted
3 to talk about. Vague and speculative.
4 THE COURT: Sustained.
5 Q. BY MR. MESEREAU: Did Prosecutor Zonen
6 point out certain portions of those volumes that he
7 wanted -- that he appeared to want to discuss with
8 you?
9 MR. ZONEN: Objection as to asked and
10 answered and speculative as to what he appeared to
11 want to ask.
12 THE COURT: I think you need to cut that
13 question in half.
14 MR. MESEREAU: Okay. All right.
15 THE COURT: I'll sustain the objection.
16 Q. BY MR. MESEREAU: During your three-hour
17 meeting last night with Prosecutor Zonen, you looked
18 at seven or eight volumes of your deposition, right?
19 MR. ZONEN: Objection; assumes facts not in
20 evidence that she looked at seven or eight volumes
21 of anything.
22 THE COURT: Overruled.
23 You may answer.
24 THE WITNESS: I'm sorry, you lost me. Um,
25 can you repeat it?
26 Q. BY MR. MESEREAU: Yes, sure.
27 During your three-hour meeting last night
28 with Prosecutor Zonen, you went through volumes of 5369

1 the deposition you gave in your suit against Michael
2 Jackson, correct?
3 A. I don't know if it was volumes. It was just
4 whatever page had opened, you know.
5 Q. Who opened the pages?
6 A. It wasn't me.
7 Q. It was Prosecutor Zonen, wasn't it?
8 A. Yes.
9 Q. And he seemed to have certain pages he
10 wanted to talk to you about, correct?
11 MR. ZONEN: Objection as to what he wanted
12 to talk about. Speculative.
13 THE COURT: Overruled.
14 You may answer.
15 THE WITNESS: I have no idea. I just was --
16 he was just going through it, period. I don't --
17 Q. BY MR. MESEREAU: And was he asking you
18 questions about what you said in that deposition?
19 A. No. He was just reading it.
20 Q. Okay. I'm going to ask you some questions
21 about the deposition you gave in the Chandler
22 suit --
23 A. Uh-huh.
24 Q. -- on December 7th, 1993, okay?
25 A. Sure.
26 Q. Do you remember you said under oath that you
27 trust Mr. Jackson and you would leave your son alone
28 with him? 5370

A. I don't recall any of that. I don't recall --
I don't know what I said, because I have not looked
at that.
Q. Might it refresh your recollection if I just
show you that page?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance --
excuse me. Have you had a chance to look at those
pages of your deposition?
A. No. Oh, right now? Yes, I'm sorry. Sorry.
Q. Does it refresh your recollection about what
you said in that deposition?
A. Yes.
Q. You said words to the effect, "I trust Mr.
Jackson," and you would leave your son alone with
him, right?
A. I believe so.
Q. Okay. You were asked if you ever saw Jordie
Chandler in Michael Jackson's bedroom and you said,
"No," right?
A. Correct, I believe.
Q. You said you had never seen Brett Barnes
sleep in Michael Jackson's room, right?
A. Probably. I can't recall everything in
that. 5371

Q. Would it refresh your recollection if I show you?
A. I hate to have you keep coming back, but that's fine.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Yeah.
Q. BY MR. MESEREAU: Have you had a chance to look at that page?
A. Yes.
Q. Does it refresh your recollection about what you said under oath in that deposition?
A. Yes.
Q. You said you had never seen Brett Barnes sleep in Michael Jackson's room, right?
A. Correct.
Q. You didn't recall when you had met Wade Robeson for the first time, right?
MR. ZONEN: Objection; hearsay.
MR. MESEREAU: I'll rephrase it. I'll withdraw it.
Q. Do you remember testifying under oath that you didn't recall when you met Wade Robeson for the first time?
MR. ZONEN: Objection; hearsay.
THE COURT: Overruled.
You may answer.
THE WITNESS: Um, actually, I don't -- I 5372

don’t recall. I didn’t go over that, so I don’t --
Q. BY MR. MESEREAU: Would it refresh your
recollection if you look at that page?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page of your deposition?
A. Yeah.
Q. Does it refresh your recollection about your
saying you don’t know when you first met Wade
Robeson?
A. Yes.
Q. Do you remember testifying you didn’t know
how many times Brett Barnes had been to the ranch?
A. Probably.
Q. Do you know if that’s what you said?
A. I believe -- I don’t know.
Q. Would it refresh your recollection to look
at the page?
A. Sure.
MR. MESEREAU: May I approach?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page?
A. Yes. 5373

Q. And you testified under oath you didn't know how many times Brett Barnes had been to the ranch, right?
A. I believe so.
Q. Okay. Do you remember testifying under oath that you didn't know where Brett Barnes slept?
A. I probably did. I don't remember.
Q. Might it refresh your recollection if I show you the page?
A. (Nods head up and down.)
MR. MESEREAU: May I approach, Your Honor?
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that page?
A. Yes.
Q. Does it refresh your recollection about what you said under oath about whether you knew where Mr. Barnes slept?
A. Yeah.
Q. And what did you say?
A. I believe I said, "I don't know."
Q. Okay. Now, you knew you were under oath in this deposition, right?
A. Yes.
Q. Did Prosecutor Zonen discuss with you last night what you were going to say if confronted with this sworn deposition in trial?
A. No. 5374

Q. Did the issue of what you had said under oath in the Chandler deposition ever come up during the three hours you spent last night with Government Prosecutor Zonen?
A. No.
Q. Okay. Do you remember being asked under oath in that deposition if you ever saw Jordie Chandler's clothes at the ranch?
A. I believe that I do recall that.
Q. Do you remember saying that you saw his mother bring them into Mr. Jackson's room in a suitcase?
A. Yes.
Q. Do you remember being asked questions by Mr. Feldman about the alarm system in Mr. Jackson's room?
A. I don't recall that.
Q. Remember telling him, "People like to kill celebrities, so you have to be careful with your life"?
A. I don't recall that.
Q. Okay. Would it refresh your recollection if I show you that portion of your deposition?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to review that page? 5375

A. Yes.
Q. Does it refresh your recollection about what you said under oath to Mr. Feldman on that subject?
A. Yes.
Q. You did say, “When you’re a celebrity, you live a different life than regular people. I mean, people like to kill celebrities, so, you know, he has to be careful, you know, with his life.” And then --
MR. ZONEN: I’m going to object as to hearsay, reading from a deposition that’s not inconsistent with current testimony.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Now, are you telling the jury that throughout this deposition you committed perjury?
MR. ZONEN: Objection; calls for a legal conclusion.
MR. MESEREAU: I believe it was raised on direction examination by the prosecutor, Your Honor.
MR. ZONEN: Not issues of perjury.
THE COURT: I’ll sustain the objection to the question as phrased.
MR. MESEREAU: Okay.
Q. You told Prosecutor Zonen that you repeatedly lied under oath in that deposition, correct?
A. Are you -- what are you talking about? 5376

Q. When Prosecutor Zonen asked you some questions today in court, remember that?
A. Okay, yes.
Q. He asked you if you had lied under oath in the Chandler deposition, right?
A. Right.
Q. You said you did, right?
A. Right.
Q. Do you know how many times you lied under oath in the Chandler deposition?
A. I believe the whole time I did not tell the truth on that.
Q. Did you believe you were committing a crime when you did that?
A. I really didn't. I really didn't think of it that way.
Q. Well, let me ask you this: So far, you've admitted you lied under oath in the Chandler deposition for what, a day?
A. Well, throughout that -- throughout that deposition, yes.
Q. And Judge St. John found that you lied in that trial, right?
MR. ZONEN: Objection. Asked and answered; argumentative.
THE COURT: The objection is sustained.
Q. BY MR. MESEREAU: And the jury found you didn't tell the truth in your suit against Mr. 5377

Jackson, right?
MR. ZONEN: Objection. Asked and answered;
and argumentative.
THE COURT: Sustained.
Mr. Mesereau, a few questions back, after
you refreshed her recollection with the transcript
about “you’re a celebrity,” I sustained an
objection, and I was incorrect.
MR. MESEREAU: Okay.
THE COURT: Do you want to reask that
question? I’ll reverse my ruling on that.
MR. MESEREAU: Thank you, Your Honor.
THE COURT: So what had happened is she’d
refreshed her recollection, and then you wanted
to --
MR. MESEREAU: Okay.
THE COURT: Go ahead.
Q. BY MR. MESEREAU: Do you remember I showed
you the page of the deposition about what you said
about “people try to kill celebrities”?
A. Yes.
Q. And did that refresh your recollection about
what you said on that issue under oath?
A. I believe so.
Q. Okay. And as you recall, what did you say
under oath on that issue?
MR. ZONEN: Objection; irrelevant.
THE COURT: Overruled. 5378

THE WITNESS: I forgot.
Q. BY MR. MESEREAU: Would it refresh your recollection if I show it to you again?
A. Yes.
THE COURT: What I'm going to do is let you read it to her. That's what I stopped you from doing. And I'll allow you to do it.
MR. MESEREAU: Thank you, Your Honor.
THE COURT: And he's going to ask you if this is --
You ask her.
(Laughter.)
MR. MESEREAU: Okay. All right.
Q. Ms. McManus, this is what you said under oath: "But you have to understand now, when you're a celebrity, you live a different life than regular people. I mean, people like to kill celebrities, so, you know, he has to be careful, you know, with his life, and that little sensor benefits him for his life."
Remember saying that?
A. I believe so.
Q. Okay. Now, you weren't lying when you said that, were you?
A. No.
Q. In fact, you knew that Mr. Jackson is very nervous about his personal security, isn't he?
MR. ZONEN: Objection. Speculative as to 5379

what he is nervous about; lack of foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: Repeat it, please.
Q. BY MR. MESEREAU: You knew when you worked at Neverland that Mr. Jackson is extremely nervous about his security, isn't he?
A. I really don't know.
Q. Well, when you saw his bodyguards, right?
A. Are you talking --
Q. Huh?
A. Are you talking OSS or just security from the house?
Q. Let me rephrase it. I think I was too vague on that one.
A. Okay.
Q. During the time you worked at Neverland --
A. Uh-huh.
Q. -- was it your understanding that Mr. Jackson is someone who's very concerned about his personal security?
A. I really don't know. I mean -- I don't know.
Q. You knew he had personal bodyguards to protect him, right?
A. Yeah.
Q. You knew they traveled with him when he went on tours around the world, right? 5380

A. Yeah.
Q. You knew they were often armed, right?
A. Yes.
Q. And you knew that he was always concerned about threats to his personal welfare, right?
A. I don't know about that. But, I mean, I don't want to answer that, because I don't know.
Q. Did it ever occur to you that he might be concerned about his personal welfare?
A. I -- I don't know. I --
Q. Okay. You testified under oath that twice you saw June Chandler bring her son Jordie's clothes in a suitcase into Mr. Jackson's room?
A. I don't know if it was twice. I know at least once. I don't remember what I said on that.
Q. Would it refresh your recollection if I just show you that page?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that page of your sworn deposition?
A. Yes.
Q. Does it refresh your recollection about what you said on that subject?
A. Yes.
Q. What did you say? 5381

A. Twice.
Q. Okay. You testified that you saw Mrs.
Chandler open the suitcase and take clothes out,
right?
A. I -- you know what, I don't recall.
Q. Do you remember saying that she would sit
down on the floor, take clothes out of the suitcase,
fold them? Do you remember that?
A. Honestly, no, I don't remember.
Q. Would it refresh your recollection if I show
you that page?
A. Yeah. Sorry.
MR. MESEREAU: May I approach, Your Honor?
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page of your sworn deposition?
A. Yeah.
Q. Does it refresh your recollection about what
you said on that subject?
A. Yes.
Q. What did you say?
A. That she would fold the clothes.
Q. That she would bring the suitcase and get on
the floor and --
A. And fold the clothes, yes.
Q. Remember testifying under oath that you were
never there at night when Jordie Chandler was in the
room? 5382

A. You know what, I don't recall.
Q. Remember testifying you said you were never at Neverland at night when Jordie was there?
A. I don't recall that either.
Q. Would it refresh your recollection if I show you that page?
A. Sure. Probably, yes.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that page of your sworn deposition?
A. Yes.
Q. Does it refresh your recollection about what you said about that subject?
A. Yes.
Q. What did you say?
A. That I wasn't there at night with Jordie.
Q. Now, there were many occasions where Jordie Chandler, his mother and sister would come to the ranch and stay, right?
A. I believe so.
Q. Do you remember what his sister's name was?
A. Lily.
Q. Did you ever talk to Lily?
A. I don't believe so.
Q. Do you know what his mother's name was?
A. June Chandler. 5383

Q. Did you ever talk to June Chandler?
A. Yes.
Q. What were your typical hours working at Neverland?
A. They varied, actually.
Q. Was there a particular time you normally punched in?
A. Sometimes 8:30, sometimes 9:00 in the morning.
Q. Do you remember testifying that you have never seen Mr. Jackson in bed?
A. I don’t recall.
Q. Might it refresh your recollection if I show you your deposition?
A. Sure.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to look at that page?
A. Yes.
Q. Does it refresh your recollection about what you said --
A. Yes.
Q. -- on that occasion?
A. Yes.
Q. What did you say?
A. That I didn’t see him in his bed. 5384

Q. You'd never seen Mr. Jackson in bed, right?
A. Right.
Q. What was your understanding about when you were supposed to be at Neverland to do your work?
A. Well, there was a schedule, and we kind of just followed the schedule. But then there were times that you didn't know when you were going to go home because of the guests being there late. So you come in at a certain time, but that didn't mean that you were going to leave at the time that you were scheduled.
Q. So how would you learn what time you had to be there?
A. I believe there was a schedule that was made. You know, like supervisor would make it. And you'd be on the schedule at maybe 8:30 or 9:00, sometimes maybe till 5:30 or 6:00. But then, like I said, if there were guests, you didn't know what time you were going to go home.
Q. Do you remember testifying you couldn't tell if Mr. Jordie Chandler ever took a shower with Mr. Jackson, right?
A. A shower with Jackson?
Q. Yes.
A. Perhaps.
Q. Would it refresh your recollection if I show you that page?
A. Yeah. 5385

MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Yes.
Q. BY MR. MESEREAU: Have you taken a look at that page?
A. Yes.
Q. Does it refresh your recollection about what you said?
A. Yes.
Q. And what did you say?
A. I said I didn't -- I said I didn't -- I don't know, I just forgot. Sorry.
Q. You said you couldn't tell if Mr. Jackson ever took a shower with Mr. Jackson, right?
A. I couldn't tell. Right. Right.
Q. You said you'd never seen Mr. Jackson in a Jacuzzi, right?
A. In a Jacuzzi, like taking a bath in a Jacuzzi, is that what you're talking about?
Q. You said you had never seen Mr. Jackson in his Jacuzzi?
MR. ZONEN: I'll object as hearsay if it's not inconsistent with current testimony, also vague.
THE COURT: Sustained.
Q. BY MR. MESEREAU: You testified under oath that you'd never seen Jordie Chandler get ready to go to bed, right?
A. Perhaps. Like I said, I haven't gone over 5386

that, and I'm sorry.
Q. Would it refresh your recollection if I show you that page?
A. Yeah.
MR. MESEREAU: May I approach?
THE COURT: Yes.
Q. BY MR. MESEREAU: Have you had a chance to look at that page?
A. Yes.
Q. Does it refresh your recollection about what you said?
A. Yes.
Q. And what did you say about Mr. Chandler on that issue?
A. That I didn't see him ready to go to bed.
Q. And you also said you'd never seen him get up in the morning, right?
A. Correct.
Q. The prosecutor asked you a couple of questions about whether Mr. Jackson ever played with a pet monkey in his bedroom, right?
A. Yes.
Q. And I believe you said he had; is that right?
A. Yes.
Q. Okay. Was that chimpanzee's name Max?
A. I believe so.
Q. When you had your deposition taken in the 5387

Chandler case, you said you'd never seen a
chimpanzee in his bedroom, right?
A. Perhaps.
Q. Would it refresh your recollection if I show
you the deposition?
A. Yes.
MR. MESEREAU: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. MESEREAU: Have you had a chance to
look at that page?
A. Yes.
Q. Does it refresh your recollection about what
you said under oath at that deposition?
A. Yes.
Q. And what did you say?
A. I said, "No."
Q. You said everybody plays with the chimpanzee
but you've never seen it in Mr. Jackson's room,
right?
A. I believe so.
Q. Okay. Did you work at Neverland when Blanca
Francia was working there?
A. Yes, I did.
Q. And how long did you work at Neverland when
Blanca Francia was also working there?
A. I would think maybe nine months.
Q. Did you share similar responsibilities with 5388

Blanca Francia?
A. Are you talking about Mr. Jackson's room, or just as a maid, as an aide?
Q. Let me rephrase it.
When you worked at Neverland, what did you understand Blanca Francia's responsibilities to be?
A. Blanca had Mr. Jackson's room. She was his personal maid. Although Blanca did help out with the other things in the house or the guest units. She kind of did a lot of everything.
Q. And when you worked at Neverland, what did you understand your responsibilities to be?
A. Are you talking about the beginning or --
Q. Let's start at the beginning, sure.
A. Okay. When I started, I was just a regular maid, like everybody else. I was in the kitchen helping wash dishes. Set tables. I mean, actually a lot of different stuff. You know, cleaning the guest quarters, the theater, everything, except Mr. Jackson's room.
Q. When did you begin to clean Mr. Jackson's room?
A. Actually, about nine months after my employment, which was when Blanca quit.
Q. During the first nine months of your employment when Blanca was working there, did you ever go into Mr. Jackson's room?
A. I can't recall. 5389

Q. Do you recall ever having similar responsibilities in Mr. Jackson's house to Blanca Francia?
A. At times, yeah, maybe.
Q. Were there times when she would clean Mr. Jackson's room on a given day, and on another day you would clean Mr. Jackson's room?
A. No. No.
Q. Okay. So you didn't go near his room for the first nine months you worked there, right?
A. Correct.
Q. During those nine months, did you and Blanca Francia speak to each other?
A. Yes.
Q. Did you speak to each other often during those first nine months?
A. Yes.
Q. Did you ever learn that Blanca Francia had sold a story to a television show?
A. Um, I heard she did.
Q. Did you hear she had sold a story for money to Hard Copy?
A. I heard she did.
Q. Okay. Did you and Blanca ever discuss that subject?
A. No.
Q. How many -- let me rephrase that. You sold the sketch to a tabloid, right? 5390

A. Me personally?
Q. Yes.
A. Not me personally. Somebody else did.
Q. Well, they did it on your behalf, right?
A. Well, I would probably think so. I don't --
yeah.
Q. Well, how did that person get the sketch?
A. Gary Morgan had gone to our attorney's
office, Mr. Ring, Michael Ring, and that's where he
got it, from there, at the attorney's office.
Q. Did you bring the sketch to Mr. Ring's law
office?
A. Yes, I did.
Q. Did you tell Mr. Ring, "I took this from
Neverland Ranch"?
A. No, I -- actually, I don't even -- I don't
even think Michael Ring -- I don't even think he saw
it. I don't know if he saw it.
I told Gary Morgan that I got it out of the
trash. And I told him he could have it. So that's
kind of where that went. And I don't know what
Gary --
Q. Well, you didn't really say he could have
it, you sold it?
A. Actually, I told him he could have it. And
he went and, I guess, sold it. And then I think he
said something in the tabloid, I don't even know
which one it was, something that I had told him that 5391

I got it out of Mr. Jackson's bedroom in the trash or something to that -- which was not correct.
Q. You're telling the jury that Michael Jackson did a sketch of Elvis Presley and you picked it out of the trash?
A. I found it outside by the rec room in the trash, in the trash. And when I found it there, I thought, well, it was neat, so I took it. It was in the trash.
Q. Is that one of the items the Santa Maria jury found you had stolen?
A. Well, that's what they --
MR. ZONEN: Objection; asked and answered.
THE COURT: Sustained.
Q. BY MR. MESEREAU: When you went to Mr. Ring, did you tell this attorney where you got the sketch?
A. I don't even recall if I -- he probably heard during the deposition that -- because I think I was questioned about that during the deposition, and I did say that I found it in the trash. But I don't remember -- I don't remember telling him about that myself. It must have been, you know, at the deposition where I said I found it in the trash.
Q. Did you sell that sketch before you went to trial in your lawsuit against Michael Jackson?
A. Before I went to trial?
Q. Yes.
A. You know what? I don't even know -- I 5392

1 really don’t know when that -- the timing. I don’t
2 know if it was during the trial maybe, later during
3 the trial.
4 Q. Let me ask you this: You’ve told the jury
5 the money that came -- excuse me. Let me rephrase
6 it.
7 You’ve told the jury the money that was
8 obtained in return for that sketch helped fund your
9 lawsuit against Mr. Jackson, right?
10 A. Correct.
11 Q. Did you know when you did that that Mr.
12 Jackson was alleging that you had stolen that
13 sketch?
14 A. Not that I know of.
15 Q. Let me ask you if this statement is
16 accurate: You took what you were accused of
17 stealing and sold it for money to fund your lawsuit
18 against Mr. Jackson, right?
19 A. I took what I found in the trash and gave it
20 to Gary Morgan and he sold it.
21 Q. And at some point you knew you were accused
22 of stealing that sketch of Elvis Presley, right?
23 A. I got accused of that, yes.
24 THE COURT: All right. Let’s end for today.
25 (The proceedings adjourned at 2:30 p.m.)
26 --o0o--
27
28 5393

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 5216 through 5393 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 7, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 7, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304